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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLENE CARTER,)

Plaintiff,)

VS.) CIVIL ACTION

SOUTHWEST AIRLINES CO.,) NO.: 3:17-cv-02278-X

AND TRANSPORT WORKERS)

UNION OF AMERICA, LOCAL)

556,)

)

Defendants.)

VIDEOCONFERENCE ORAL AND VIDEOTAPED DEPOSITION OF
BRIAN TALBURT
JULY 3, 2022

VIDEOCONFERENCE ORAL AND VIDEOTAPED DEPOSITION
OF BRIAN TALBURT, produced as a witness at the
instance of the Plaintiff, and duly sworn, was
taken in the above-styled and numbered cause on
July 3, 2022, from 4:13 p.m. to 7:33 p.m., via
Zoom Videoconference, before Melody A. Monk, CSR
in and for the State of Texas, reported by machine
shorthand, with the witness located in

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Albuquerque, New Mexico, pursuant to the Federal
Rules of Civil Procedure, and the provisions
stated on the record or attached hereto.

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APPEARANCES
(All parties appearing via Zoom Videoconference)

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ALSO PRESENT:
Charlene Carter
Lisa Block, Videographer

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1 THE VIDEOGRAPHER: We're going on the

2 record July 3rd, 2022 for the deposition of Brian

3 Talburt in a case styled Charlene Carter versus

4 Southwest Airline Company and Transport Workers

5 Union of America, Local 556, Civil Case No.

6 3:17-cv-02278-X in the United States District

7 Court for the Northern District of Texas, Dallas

8 Division.

9 The time is approximately 4:13 p.m.

10 Will counsel state their appearances, locations,

11 and agreements or stipulations for the record;

12 following will the court reporter please swear in

13 the witness.

14 MR. PRYOR: Bobby Pryor for the

15 plaintiff, Charlene Carter, along with Matt

16 Gilliam. We're in Rockwall, Texas.

17 MR. MCKEEBY: Paulo McKeeby for

18 defendant Southwest Airlines. I am in Dallas,

19 Texas, along with Brian Morris, also from my law

20 firm, who also represents Southwest Airlines.

21 MR. GREENFIELD: Adam Greenfield on

22 behalf of Transport Workers Union, Local 556,

23 along with Edward Cloutman, III, and we are in

24 Dallas, Texas as well.

25 BRIAN TALBURT,

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1 having been first duly sworn, testified as

2 follows:

3 EXAMINATION

4 BY MR. PRYOR:

5 Q. State your name, please.

6 A. Brian Talburt.

7 Q. Mr. Talburt, my name is Bobby Pryor. I

8 represent Charlene Carter.

9 Who have you spoken to about your

10 deposition?

11 A. Southwest attorney Paulo, and, and Adam

12 Greenfield and Ed Cloutman.

13 Q. So -- I'm sorry, Paulo McKee?

14 A. Yes. Yes.

15 Q. And who else?

16 A. Adam Greenfield and Ed Cloutman.

17 Q. Are any of those attorneys your attorney?

18 A. No.

19 Q. Tell me about your conversations with

20 Paulo, the attorney for Southwest.

21 A. Basically him just advising me of this

22 deposition and the specifics of it and the details

23 of it, and to basically just tell the truth.

24 Q. What were the specifics and the details?

25 A. Well, to be on the Zoom call at 2 -- 4

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1 o'clock Central Time today, as we are.

2 Q. Anything else?

3 A. No.

4 Q. Tell me about your conversation with the

5 two attorneys for Local 556.

6 A. Similar conversation, just a question

7 whether my participation was mandatory or not.

8 Q. Tell me about that.

9 A. Basically they advised me that I was

10 ordered by the court to be here. Therefore, I'm

11 here.

12 Q. Did you have any substantive discussions

13 with any of these attorneys about your deposition?

14 A. No.

15 Q. Have you had substantive discussions with

16 anyone about your deposition?

17 A. No.

18 Q. Has anyone shown you any documents?

19 A. No.

20 Q. What have you done to prepare for your

21 deposition?

22 A. Very little. Just basically being here.

23 Q. Very little, can you define what that

24 would be?

25 A. Well, I, I briefly read over some prior

Brian Talburt

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<p>1 depositions, so I have a, a vague idea of what the</p> <p>2 line of questioning is.</p> <p>3 Q. What depositions did you read over to get</p> <p>4 a vague idea of what the questions would be?</p> <p>5 A. A deposition given some time ago from TWU</p> <p>6 president Audrey Stone.</p> <p>7 Q. How did you get a copy of that deposition?</p> <p>8 A. It was provided to me by somebody.</p> <p>9 Q. Who?</p> <p>10 A. Pardon me?</p> <p>11 Q. Who?</p> <p>12 A. Somebody sent me a link to a, to a website</p> <p>13 that I could see that.</p> <p>14 Q. Did you not understand the question, sir?</p> <p>15 A. Yes, I understood the question.</p> <p>16 Q. Would, would you answer it?</p> <p>17 A. I'm sorry?</p> <p>18 Q. Answer it, please.</p> <p>19 A. A, a coworker sent me a link.</p> <p>20 Q. Okay. Well, we're working our way to the</p> <p>21 name of a human being. Could you answer that for</p> <p>22 me?</p> <p>23 A. A person, a gentleman named Casey Rittner.</p> <p>24 Q. Who is that?</p> <p>25 A. A coworker.</p>	<p>1 cover portions, if not all, of Ms. Stone's</p> <p>2 deposition?</p> <p>3 A. No.</p> <p>4 Q. And how did Mr. Rigger happen to have a</p> <p>5 copy of Ms. Stone's deposition?</p> <p>6 A. I, I -- my understanding was basically</p> <p>7 just fishing, looking for information. It's</p> <p>8 public inform -- it is public information.</p> <p>9 Q. So the, the deposition was published, is</p> <p>10 what you're saying?</p> <p>11 A. That's correct.</p> <p>12 Q. That's what Mr. Rigger told you?</p> <p>13 A. Correct.</p> <p>14 Q. And do you know why Mr. Rigger was fishing</p> <p>15 for this deposition?</p> <p>16 A. Just curiosity.</p> <p>17 Q. Is Mr. Rigger associated with Local 556?</p> <p>18 A. No.</p> <p>19 Q. Does he work for Southwest Airlines?</p> <p>20 A. Yes.</p> <p>21 Q. What's his position?</p> <p>22 A. Flight attendant.</p> <p>23 Q. So he's, he -- is he an objector?</p> <p>24 A. No.</p> <p>25 Q. Why is he not a member of the --</p>
Page 10	Page 12
<p>1 Q. And how did you happen to receive this</p> <p>2 from your coworker Stacey Rigger (sic)?</p> <p>3 A. Via, via online site.</p> <p>4 Q. How did he --</p> <p>5 A. A me -- a me -- a message.</p> <p>6 Q. How did you know to have a communication</p> <p>7 with Mr. Rigger such that you would get a copy of</p> <p>8 a deposition in this case?</p> <p>9 A. It was something that was discussed quite</p> <p>10 some time ago when this first happened two years</p> <p>11 ago.</p> <p>12 Q. Who was it discussed with, Rigger?</p> <p>13 A. Yes.</p> <p>14 Q. Who else?</p> <p>15 A. That's all.</p> <p>16 Q. And are you aware that there's a</p> <p>17 confidentiality order in this agreement prior to</p> <p>18 reading that deposition?</p> <p>19 A. I'm sorry, I don't, I don't understand the</p> <p>20 question.</p> <p>21 Q. Well, do you know what a confidentiality</p> <p>22 order is?</p> <p>23 A. Of course.</p> <p>24 Q. Okay. Are you aware that there's a</p> <p>25 confidentiality order in this case which would</p>	<p>1 A. Not that I -- not, not, not that I know</p> <p>2 of.</p> <p>3 Q. Okay. I thought I asked if he was with</p> <p>4 Local 556. I think there's only two options.</p> <p>5 You're a member or you're --</p> <p>6 A. Well, my --</p> <p>7 Q. -- not.</p> <p>8 A. Well, my unders -- my, my understanding of</p> <p>9 the question was whether he served in an official</p> <p>10 capacity. He does not serve in an official</p> <p>11 capacity; yes, he's a member of TWU 556.</p> <p>12 Q. Okay. All right. So Mr. Rittner is a</p> <p>13 union supporter; you agree with that?</p> <p>14 A. He's a member of 55 -- TWU Local 556.</p> <p>15 Q. Okay. That wasn't my question, was it?</p> <p>16 A. I, I don't know whether he's a supporter</p> <p>17 or not. He's a member of TWU 556. So --</p> <p>18 Q. It --</p> <p>19 A. -- you'd have to define what's, what's,</p> <p>20 what's, what's a supporter.</p> <p>21 Q. Let me --</p> <p>22 A. He's a member.</p> <p>23 Q. Go ahead. He's a member.</p> <p>24 Okay. So it would be helpful if you</p> <p>25 would answer the question that I ask. I had</p>

3 (Pages 9 to 12)

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<p style="text-align: right;">Page 13</p> <p>1 already asked you if he was a member, and then I</p> <p>2 asked you if he was a spor -- a supporter, and you</p> <p>3 told me again that he was a member. If you don't</p> <p>4 understand a word, you're more than welcome to</p> <p>5 ask. But would you please answer the question</p> <p>6 that you're asked.</p> <p>7 MR. GREENFIELD: I'll go ahead and</p> <p>8 object to the form of the question at this time.</p> <p>9 You may go ahead and, and answer.</p> <p>10 A. I think I answered the question. Did I</p> <p>11 not?</p> <p>12 Q. No, you didn't. You answered it by saying</p> <p>13 he was a member, and I asked if he was a</p> <p>14 supporter.</p> <p>15 A. I, I --</p> <p>16 Q. Now you've answered it. You've</p> <p>17 subsequently answered it after I asked it three</p> <p>18 times.</p> <p>19 So you're -- you understand you're</p> <p>20 under oath today, true?</p> <p>21 A. Correct.</p> <p>22 Q. You're gonna answer the que -- the</p> <p>23 questions truthfully?</p> <p>24 A. Yes.</p> <p>25 Q. Will you answer the questions without</p>	<p style="text-align: right;">Page 15</p> <p>1 not.</p> <p>2 Q. Do you know whether or not he has turned</p> <p>3 in to Southwest Airlines members of recall efforts</p> <p>4 against certain leadership of the union?</p> <p>5 A. I have no idea.</p> <p>6 Q. Have you done that?</p> <p>7 A. Done -- yes. I'm, I'm sorry, have I</p> <p>8 turned in who?</p> <p>9 Q. Well, what did you think you were saying</p> <p>10 yes to under oath?</p> <p>11 A. Have I turned in people, members of TWU.</p> <p>12 That's what I understood you asked.</p> <p>13 Q. Did you speak to anyone about your trial</p> <p>14 subpoena?</p> <p>15 A. The attorneys, yes.</p> <p>16 Q. Who did you speak to about your trial</p> <p>17 subpoena?</p> <p>18 A. Adam Greenfield, Ed Cloutman, and, and</p> <p>19 Paulo.</p> <p>20 Q. Tell me about each of those conversations.</p> <p>21 A. I called both of them to find out whether</p> <p>22 my testimony was, was mandatory, whether I was</p> <p>23 required to be here or not, basically the</p> <p>24 specifics of it, what time we would be meeting and</p> <p>25 so forth.</p>
<p style="text-align: right;">Page 14</p> <p>1 evasion?</p> <p>2 A. I will answer the questions that you ask</p> <p>3 me, yes.</p> <p>4 Q. That wasn't what I asked. You're being</p> <p>5 evasive about whether --</p> <p>6 A. Sir --</p> <p>7 Q. -- or not you will answer questions</p> <p>8 without evasion.</p> <p>9 A. Sir, I was not in the least bit evasive to</p> <p>10 you. I misunderstood your intent. The way you</p> <p>11 asked the question, how my brain processed the</p> <p>12 question was did he serve as a official capacity</p> <p>13 with TWU 556. He does not serve as a official</p> <p>14 capacity to my knowledge. Yes, he is a member of</p> <p>15 TWU 556.</p> <p>16 Q. Will you answer my questions without</p> <p>17 evasion?</p> <p>18 A. Yes, sir.</p> <p>19 Q. A union supporter would be someone that</p> <p>20 pays their dues, supports the leadership in their</p> <p>21 efforts, goes to meetings, assists leadership.</p> <p>22 Did Mr. Rittner fall into any of those categories?</p> <p>23 A. The only information that I know about him</p> <p>24 is he's a member of TWU 556. I don't, I don't</p> <p>25 know whether he does any of those other things or</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Why were you trying to avoid service of</p> <p>2 the subpoena in this case?</p> <p>3 A. Because I don't really feel that I have</p> <p>4 any role in this, and I'm aware of --</p> <p>5 Q. Did --</p> <p>6 A. Go ahead.</p> <p>7 Q. Do you know what the law is in regard to</p> <p>8 trying to avoid a subpoena, sir?</p> <p>9 A. That's why I'm here.</p> <p>10 Q. No. That, that --</p> <p>11 MR. PRYOR: Object, nonresponsive.</p> <p>12 Q. You're here because you've been</p> <p>13 subpoenaed. I'm asking you, do you know what the</p> <p>14 consequences are of trying to avoid service of a</p> <p>15 subpoena?</p> <p>16 A. I wasn't necessarily avoiding service of a</p> <p>17 subpoena.</p> <p>18 Q. So when you told us, yes, you were</p> <p>19 avoiding service of the subpoena a few minutes</p> <p>20 ago, you now, in the span of 40 seconds, changed</p> <p>21 your mind; is that right?</p> <p>22 A. I didn't -- I, I don't recall saying I</p> <p>23 avoided a subpoena. I avoid -- I was hoping to</p> <p>24 avoid not being here.</p> <p>25 Q. You realize that this is being recorded,</p>

4 (Pages 13 to 16)

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<p>1 the words will be played for the jury, and what 2 you're telling the jury, you'll rest your 3 credibility on this, is you did not say yes to the 4 question of whether or not you were attempting to 5 avoid a subpoena; is that right? 6 MR. GREENFIELD: Objection, form. The 7 record speaks for itself. 8 MR. PRYOR: It sure does. 9 Q. But you can still answer. 10 A. Repeat the question, please. 11 Q. You would allow your credibility to this 12 jury to rest on you saying that you did not answer 13 the question, yes, that you were avoiding a 14 subpoena; is that right? 15 MR. MCKEEBY: Object to form. 16 A. What is the specific question, please? 17 Q. No, you've already answered it, sir. Now 18 you've changed your answer. 19 A. No -- 20 Q. Are you denying your change? 21 A. No, I have not changed my answer. 22 (Discussion off the record). 23 Q. Now, were you a supporter of Audrey Stone, 24 both when she ran for union leadership and while 25 she was in union leadership?</p>	<p>1 major activities as a member of Local 556, 2 correct? 3 A. I've given you a list of the activities 4 that I can remember participating in, in 40 years 5 of service, yes. 6 Q. What did you do as a member of CAN? 7 A. Basically that was a lounge education and 8 a lounge -- and a mobilization effort for a 9 contract negotiation. 10 Q. That's -- stands for Contract Action 11 Network? 12 A. Correct. 13 Q. When were you a part of CAN? 14 A. That would have been for our first 15 tentative agreement for our contract that 16 ultimately was settled in 2015, I guess. So I'm 17 guessing that would have been 2013. 18 Q. Was that for the contract that was 19 ultimately rejected and then a new contract done? 20 A. Correct. 21 Q. Tell me about your relationship with 22 management of Southwest Airlines. 23 A. I -- 24 MR. MCKEEBY: Object to the form of 25 the question.</p>
Page 18	Page 20
<p>1 A. Yes, I supported her in her campaign. 2 Q. Well, did you support her in her -- while 3 she was a leader? 4 A. In most, in most situations, yes. 5 Q. What have you done as a union member? 6 Tell us about your activity as a union member. 7 A. Other than attending many meetings, I ran 8 for office. My -- probably my second year at 9 Southwest, which would have been 38 years ago; 10 never ran for another position. Have done some 11 volunteer work at contract negotiation time in 12 terms of lounge education and mobilization 13 efforts. 14 Q. Anything else? 15 A. I participated in a get-out-to-vote effort 16 back in 20 -- I don't remember what the year the 17 election was. 2015 perhaps. 18 Q. Anything else? 19 A. I participated in a scheduling committee 20 probably 12, 13 years ago, perhaps. 21 Q. Anything else? 22 A. Not that I can think of off the top of my 23 head. 24 Q. It would be fair to say that you believe 25 that you've just given a list of, of all of your</p>	<p>1 I'm sorry, you can answer. I just 2 lodged an objection, but please answer. 3 A. In 40 years of service, obviously I've, 4 I've -- known a number of people over the years, 5 have had a reasonable cordial relationship with 6 various members of management. 7 Q. Who? 8 A. Speci -- I mean, I -- that would be 9 hard -- you want me to go through a list of 10 everybody throughout my career? 11 Q. Well, I mean, senior members of 12 management. How about that? 13 A. Current or past? 14 Q. Well, from 2012 to 2017. 15 A. Okay. I worked closely with Mike Hafner, 16 then vice president. I worked closely with Sonya 17 Lacore; at that time that was a senior director. 18 I've had a reasonable -- a cordial relationship 19 with former senior director Naomi Hudson. That's, 20 that's pretty much it in terms of any, any type of 21 relationship other than -- when I say 22 relationship, they're all business relationships, 23 of course, but on a more than a day-to-day ir -- 24 on more of a day-to-day basis, I guess. When I 25 was working with them, I worked on a couple of</p>

5 (Pages 17 to 20)

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<p>1 projects that brought me to Dallas, so I was there 2 quite a bit. 3 Q. What about Mike Van de Ven? 4 A. I, I have no relationship with him. 5 Q. Are you currently employed by Southwest 6 Airlines? 7 A. Yes, I am. 8 Q. And what's your position? 9 A. I'm a flight attendant. 10 Q. You're still a member of Local 556? 11 A. Yes. 12 Q. And did you have issues with Southwest's 13 social media policy in 2014? 14 A. Issues meaning what? We've -- I always 15 had issue with their social media policy, yes. 16 Q. Okay. What's your issue -- 17 A. I have any -- 18 Q. What's your issue with the social media 19 policy? 20 A. It's very, very broad reaching, very, very 21 vague, and very, very invasive of personal rights. 22 Q. Do you think there should be a social 23 media policy at Southwest? 24 A. Yes. 25 Q. Okay. And -- but you just don't think</p>	<p>1 execution a single person going out and killing 2 somebody, even if that was their intent. 3 Q. Who told you that someone thought that you 4 were threatening to kill someone? Who told you 5 that? 6 A. I believe it -- that's the way it was 7 presented with me with the meeting that I had with 8 the company. 9 Q. So someone at that meeting told you that 10 someone thought you were actually threatening to 11 kill someone? 12 A. That's correct. 13 Q. And do you recall that the words that you 14 used were: Screenshots have been retained and 15 would be dealt with by a responsible party, I 16 assure you. Transvestite is a great target BTW, 17 far too stupid to know what she has gotten into. 18 Someone friend the fool and keep an eye out. We 19 need one company execution to end this nonsense. 20 Is that accurate in terms of what you 21 said, sir? 22 A. It, it -- to me it doesn't -- you're 23 reading it, so I'm going to assume it is. I -- 24 that's not quite as I repre -- as I remember it. 25 Q. Okay. How, how do you remember it? I'm</p>
Page 22	Page 24
<p>1 that this one's a good one? 2 A. I don't think the application of their 3 social media policy is, is, is well executed. 4 Q. And what was your personal encounter with 5 that policy in 2014? 6 A. I was targeted by a number of flight 7 attendants, misrepresented my, my, my, my words, 8 presented to management in a very, very 9 inaccurate and false manner, and subsequently 10 terminated two times. 11 Q. What were the words that were 12 misrepresented? 13 A. Speaking metaphorically, which I often do, 14 I used the term "a public execution," which is a 15 frequently used expression, much like a public 16 hanging. My intent was quite clear. And it was 17 represented as though -- or misrepresented by -- 18 I, I honestly don't know who, I've been led to 19 believe a group of people who targeted me as a 20 union supporter, turned it in and presented it in 21 a manner that I was threatening to kill somebody. 22 And to this day that's still often, often 23 discussed and believed by many people. Clearly 24 use -- using that type of expression is not an 25 intent to kill somebody. Nor is a public</p>	<p>1 happy to send this to you if you want, if you'd 2 like to read it. I mean, I, I can -- 3 A. That's not what -- is that -- 4 Q. -- assure you I read it word for word, but 5 you tell me that's not what it says. 6 A. I, I didn't say that. 7 Q. Okay. All right. So, first of all, when 8 you say, Screenshots have been retained and will 9 be dealt with by a responsible party, I assure 10 you, do you recall what you were talking about? 11 A. To be honest, no. 12 Q. Okay. Then it says, The transvestite is a 13 great target BTW. I assume that means by the way. 14 Surely you recall that? 15 A. To be honest with you, no. 16 Q. So you were calling a transvestite and you 17 don't recall who you were talking about? 18 A. I, I don't, I don't know who, to be honest 19 with you, no. Can, can, can we mention how many 20 years ago this was -- 21 Q. Yes. It was 2 -- 22 A. -- so we have a context? 23 Q. Sept -- September 28, 2014. 24 A. Okay. 25 Q. Okay?</p>

6 (Pages 21 to 24)

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<p>1 A. So eight years ago, okay.</p> <p>2 Q. It was eight years ago, but I don't know,</p> <p>3 some things you kind of remember, but --</p> <p>4 A. Yeah, I don't.</p> <p>5 Q. -- you don't remember?</p> <p>6 A. Yeah, I don't remember that.</p> <p>7 Q. Okay. Fair enough.</p> <p>8 It says, We need one company execution</p> <p>9 to end this nonsense.</p> <p>10 A. Okay.</p> <p>11 Q. What did you mean when you said one</p> <p>12 company execution to end this nonsense?</p> <p>13 A. The context of that comment was, was</p> <p>14 referencing social media. I remember there was a</p> <p>15 post that was made regarding a large group of</p> <p>16 Muslims in a hotel where a, a -- a wedding at a</p> <p>17 hotel. And somebody was afraid of the Muslims,</p> <p>18 and it turned into in a large -- this was on a, a,</p> <p>19 a Facebook flight attendant page, as I remember.</p> <p>20 There was a discussion about -- it turned into a</p> <p>21 large Muslim-bashing thread. And one of the --</p> <p>22 the person who brought it to my attention was</p> <p>23 married to a Muslim and took the comment very,</p> <p>24 very seriously and was very, very offended. And</p> <p>25 this was in the midst of a very challenging time</p>	<p>1 at my initial meeting.</p> <p>2 Q. And then in your Step 2?</p> <p>3 A. That would have been Becky Parker and</p> <p>4 Audrey Stone and Barbara Fitzs -- Fitzhugh --</p> <p>5 Q. Did you go to arbitration --</p> <p>6 A. -- I think was her name.</p> <p>7 Q. I'm sorry, did you go to arbitration or</p> <p>8 did it stop at Step 2?</p> <p>9 A. It stopped at Step 2.</p> <p>10 Q. Okay. And it would be fair to say that</p> <p>11 both you, Ms. Stone, Mr. McDaniel -- and I'm</p> <p>12 sorry, what was Becky's last name?</p> <p>13 A. Parker.</p> <p>14 Q. -- Becky Parker, all of you argued that</p> <p>15 your communications were protected because you</p> <p>16 were involved in union activities, correct?</p> <p>17 A. That, that, that point was brought up,</p> <p>18 yes.</p> <p>19 Q. I didn't ask if the point was brought up.</p> <p>20 I said you argued it, Mr. McDaniel argued it,</p> <p>21 Ms. Stone argued it, and Ms. Parker argued it,</p> <p>22 correct?</p> <p>23 MR. GREENFIELD: Objection, form.</p> <p>24 You can answer.</p> <p>25 A. My understanding is we didn't really</p>
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<p>1 with our union. And she was basically -- was very</p> <p>2 offended and contemplating whether to turn it in</p> <p>3 for management for discrimination. And that's</p> <p>4 where that comment came from.</p> <p>5 Q. Okay. You were --</p> <p>6 A. So I was referencing one -- I -- my, my</p> <p>7 reference was one public execution, meaning if one</p> <p>8 person was terminated, everybody else would run</p> <p>9 for cover and it would stop the, the, the, the</p> <p>10 barrage of, of social media attacks.</p> <p>11 Q. And the comment about the transvestite had</p> <p>12 something to do with that, did it?</p> <p>13 A. I -- I'm not, I'm not sure who that -- I'm</p> <p>14 going to be honest with you, I don't know who that</p> <p>15 was. I, I don't know of any transvestites at</p> <p>16 Southwest, so I'm not sure who it was referencing.</p> <p>17 Q. It's not me referencing, it's you.</p> <p>18 A. I, I understand that.</p> <p>19 Q. Okay. All right. What -- is it fair to</p> <p>20 say that both you and your union representative --</p> <p>21 by the way, who was your union representative?</p> <p>22 A. Representative when?</p> <p>23 Q. At your hearing regarding this charge.</p> <p>24 A. Well, the initial hearing would have been</p> <p>25 Thom McDaniel, our former union president. He was</p>	<p>1 discuss that aspect that much. It was basically</p> <p>2 just the, the, the misrepresentation of my actual</p> <p>3 comment. I, I don't really remember discussing</p> <p>4 the issue about -- on this particular case whether</p> <p>5 it was union ac -- sanctioned union activity or</p> <p>6 not.</p> <p>7 Q. What happened with this charge?</p> <p>8 A. Ultimately after the Step 2, they, they</p> <p>9 reduced it to a 30-day suspension, which I served.</p> <p>10 I was asked to sign a ...</p> <p>11 Q. You say reduced it; what, what happened</p> <p>12 first -- what was the first action taken?</p> <p>13 A. The first action, I was terminated.</p> <p>14 Q. So you were terminated, and then how did</p> <p>15 you get reinstated?</p> <p>16 A. Well, through the, the, the grievance</p> <p>17 process, I was entitled to a Step 2 meeting with</p> <p>18 the company. It was intended to be with the vice</p> <p>19 president or his designee, it's usually his</p> <p>20 designee, as it was in this particular case. You</p> <p>21 basically discuss why you felt why the decision</p> <p>22 that was, that was rendered on the local level was</p> <p>23 incor -- was, was not just, and, and then they,</p> <p>24 they make their -- ultimately make their decision</p> <p>25 on a higher level.</p>

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<p style="text-align: right;">Page 29</p> <p>1 Q. So you, you think at Step 2 you convinced 2 them to change their mind? 3 A. I, I don't know. Do I think I convinced 4 them? They basically heard my wording and, and my 5 intent, which was pretty clear, and I would like 6 to believe that calmer minds prevailed. 7 Q. What was Audrey Stone's position in 2014 8 when she represented you in your social media 9 policy hearing? 10 A. She was union president. 11 Q. And before that, you were represented by 12 the president, Mr. McDaniel? 13 A. Former president. He was a shop steward. 14 Q. Okay. At the time he was a shop steward? 15 A. Correct. 16 Q. When you say that Ms. Stone was junior 17 president, who was president? 18 A. I'm sorry, I don't understand. 19 Q. Okay. Well, maybe I misunderstood. In 20 2014, what was Ms. Stone's position of leadership 21 with Local 556? 22 A. Local union president. 23 Q. Okay. So she was president? 24 A. Yes. 25 Q. All right. I heard junior in there</p>	<p style="text-align: right;">Page 31</p> <p>1 whether -- I believe there's -- a question was, 2 was asked whether he was pretending to be stupid, 3 is he stupid or just pretending to be so, as I 4 remember. And I referenced a prior comment that I 5 had made that everybody in that group would have 6 known what I was talking about in a prior 7 situation, and I -- my response to that was, well, 8 based on my failed adopt a fucktard initiative, 9 which was something that was -- had occurred many 10 years prior, that everybody in there knew what I 11 was talking about, that should answer your 12 question. 13 So I was terminated for using the word 14 "fucktard," but, again, the same -- presumably the 15 same group of people that targeted me crafted 16 that -- took that word and presented it as though 17 I was -- my understanding was discriminating 18 against people with learning disabilities because, 19 of course, according to them, the word "fucktard" 20 is a derivative of the "retard," and I guess a 21 retard would fall into a protected class. So I 22 was terminated for harassing and discriminating 23 against employees with learning disabilities, 24 which is certainly quite a stretch from the word 25 "fucktard."</p>
<p style="text-align: right;">Page 30</p> <p>1 somewhere. 2 Okay. So you were reinstated, and 3 then did you have a -- another encounter with the 4 social media policy? 5 A. Yes. 6 Q. When was that? 7 A. That would have been -- 8 Q. I can suggest a -- 9 A. -- spring through -- 10 Q. -- time frame, if it helps. 11 A. Well, it was going to be spring, March or 12 April of the, the following year. 13 Q. I was going to say March of 2015. 14 A. Okay. Correct. 15 Q. Okay. And at that time, what was the 16 complaint that Southwest Airlines was dealing with 17 regarding you? 18 A. I was in -- participated in a small 19 private closed group of union loyalists during 20 election time for our local elections. There was 21 a group of 17 people in there, people that I knew, 22 all of which very well. It was a closed group, it 23 was a private group. And there was free 24 discussion in there. In there, there was a 25 question raised about a particular person as to</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Okay. 2 MR. PRYOR: Melody, would you allow 3 the screen to be shared? 4 (Discussion off the record). 5 Q. And, Mr. Talburt, can you see a document 6 on the screen? 7 A. Yes. 8 Q. And are you able to see where it says, 9 Well, Sherry, you know how successfully my adopt a 10 fucktard initiative was. That should answer your 11 question? 12 Is that the -- 13 A. Yes. 14 Q. -- post you're -- is that the post you 15 were talking about? 16 A. That -- that's the comment that I made 17 that I was terminated for, yes. 18 Q. And this was a private group on Facebook? 19 A. Correct. 20 Q. And was it report -- referred to as core 21 team? 22 A. Core group, core, core group I think is 23 what it was called. 24 Q. Okay. Core group? 25 And it was a, a group of people that</p>

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1 were supporting, among others, the candidacy of
2 Audrey Stone for union president?
3 A. Her slate, correct.
4 Q. Okay. And you were a member of that
5 group?
6 A. Correct.
7 Q. Okay. And were -- was action taken
8 against you by the company as a result of this
9 post?
10 A. Yes.
11 Q. And what happened this time?
12 A. I was terminated.
13 Q. And at this fact-finding meeting and at --
14 I don't know if I'm sharing a document. Can you
15 see a new document?
16 A. No.
17 Q. Okay. I'll have to get that one out.
18 At your -- at this fact-finding
19 meeting -- and did this also go to a Step 2?
20 A. No.
21 Q. So at the Step 1, who represented you?
22 A. Brett Nevarez.
23 Q. And was it argued at this meeting -- at
24 this hearing, by you and Brett Nevarez, that your
25 actions were protected from, among other reasons,

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1 that you were engaged in union activity, in fact,
2 in -- engaged in activity relating to an election?
3 A. Yes.
4 MR. GREENFIELD: Objection, form.
5 MR. PRYOR: What's the object to form?
6 MR. GREENFIELD: It's incomplete, it's
7 vague, and it's -- it just paints an incomplete
8 picture of what was actually occurring.
9 Q. At this meeting, did you argue that your
10 union activities should be protected from
11 Southwest's social media policy?
12 A. Yes.
13 Q. And Mr. Nevarez supported that argument on
14 behalf of the leadership of Local 556, correct?
15 A. He supported that argument. Presumably
16 the rest would be accurate as well.
17 Q. And who was president at that time of the
18 Local 556?
19 A. Audrey Stone.
20 Q. Now, at that hearing, do you recall what
21 you said? So that's kind of an unfair question.
22 That was how many years ago?
23 Let me see if I can show you a
24 transcript.
25 MR. MCKEEBY: Is that an objection to

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1 your own question?
2 MR. PRYOR: It is.
3 MR. MCKEEBY: I'll sustain that one.
4 MR. PRYOR: But I'll try again. Let
5 me see if I can find the document. Hang on.
6 Who made that objection?
7 MR. MCKEEBY: That is McKeeby, sir.
8 MR. PRYOR: I have got to remember who
9 to keep track of here. Give me just a second,
10 sir.
11 Q. Okay. Let me see if I can show this
12 document.
13 Okay. Can you see a document on the
14 screen, sir?
15 A. Yes.
16 Q. Do you see where it says March 25, 2015?
17 A. Yes.
18 Q. Does that appear to be the -- somebody's
19 notes of your either hearing or interview with
20 Southwest Airlines regarding the charge you were
21 just telling us about?
22 A. Yes, it appears to be.
23 Q. Okay. And let's go down to -- let's see
24 if this refreshes your recollection as to what he
25 said.

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1 It says -- can you see my cursor, by
2 the way?
3 A. Yes.
4 Q. Oh, good. Then maybe you can kind of
5 follow. This is where I'm reading from.
6 A. Uh-huh.
7 Q. BT, that's you, right?
8 A. Uh-huh.
9 Q. There was no intent to insult, only to try
10 to get more votes for our side. This was election
11 related and private. I just want all of this to
12 stop. They are trying to get me fired.
13 Do you recall saying words to that
14 effect at the hearing in 2015?
15 A. I, I don't recall making that statement,
16 but I probably did. And I'm, I'm not denying that
17 I did.
18 Q. Okay. Would it be consistent with either
19 your recollection or how you felt at that time, as
20 you sit here today?
21 A. I, I think so.
22 Q. Okay. Then it says -- who is TT?
23 A. Ted Thornton, the assistant base manager.
24 Q. Okay. And then you were asked the
25 question, Do you feel comfortable coming to us

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<p>1 locally? We will help.</p> <p>2 And your response is, I wouldn't want</p> <p>3 my worst enemy to have to go through this. I</p> <p>4 don't want to turn anybody in.</p> <p>5 Do you see that?</p> <p>6 A. Yes. Yes, I do.</p> <p>7 Q. And would that be consistent with your</p> <p>8 recollection or how you recall feeling at that</p> <p>9 time?</p> <p>10 A. I, I don't recall that, but obviously I</p> <p>11 said it.</p> <p>12 Q. Okay. Well, do you disagree that -- with</p> <p>13 your comment that I don't want to turn anybody in?</p> <p>14 A. Obviously I made that statement.</p> <p>15 Q. Do you agree that in 2015 you told</p> <p>16 Southwest Airlines management in regard to</p> <p>17 potential complaints under the social media policy</p> <p>18 that you don't want to turn anybody in?</p> <p>19 A. Apparently I said that, yes.</p> <p>20 Q. Okay. I'm going to get the hang of this</p> <p>21 documented out thing in a minute.</p> <p>22 Did you ever engage in -- and I think</p> <p>23 you've answered this before, but it's a little bit</p> <p>24 more specific. Did you ever engage in an effort</p> <p>25 to target union member opponents of Stone's and</p>	<p>1 Q. Oh, wait. I thought you just told -- you</p> <p>2 answered my question what did you do, and you told</p> <p>3 me, oh, I guess I just identified who they are.</p> <p>4 That's not what you said then, right?</p> <p>5 You're changing that?</p> <p>6 MR. GREENFIELD: Objection, form --</p> <p>7 A. No, I'm not changing it.</p> <p>8 MR. GREENFIELD: -- vague.</p> <p>9 MR. PRYOR: Okay.</p> <p>10 MR. GREENFIELD: The record speaks for</p> <p>11 itself.</p> <p>12 MR. PRYOR: It does. And we'll be</p> <p>13 happy to allow it to be played to the jury.</p> <p>14 Q. Sir, can you tell me, is all you did to</p> <p>15 target those groups is to just find out who they</p> <p>16 were?</p> <p>17 A. No, I, I didn't, I didn't say that, and</p> <p>18 that's not what I did.</p> <p>19 Q. Okay. So tell us what you did.</p> <p>20 A. The only thing I -- what I can think of</p> <p>21 that I did was probably be turning in social media</p> <p>22 violations, their public comments that were made,</p> <p>23 usually that were inaccurate or offensive.</p> <p>24 Q. And so when you told Southwest Airlines</p> <p>25 you don't want to turn anyone in for social media</p>
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<p>1 her slate, recall petition members, or objectors</p> <p>2 of Local 556?</p> <p>3 A. You would, you would have to define the</p> <p>4 word "target."</p> <p>5 Q. Okay. So other -- what did you do then in</p> <p>6 re -- by the way, what do you think target means?</p> <p>7 You don't recall using that word, do you?</p> <p>8 A. I, I don't -- I may or may not have.</p> <p>9 Q. Well, that covers the universe, doesn't</p> <p>10 it? Did you use the word or not?</p> <p>11 A. I, I -- I'm sure I've used that word</p> <p>12 before.</p> <p>13 Q. Okay. Then tell us -- tell the jury how</p> <p>14 you would define target in regard to targeting</p> <p>15 union member opponents to Stone and her slate,</p> <p>16 union member opponents acting in favor of a</p> <p>17 recall, and union objectors. How would you use</p> <p>18 the word "target" in regard to those three classes</p> <p>19 of people?</p> <p>20 A. I, I, I guess basically trying to isolate</p> <p>21 or identify them.</p> <p>22 Q. Okay. So all you did to target them was</p> <p>23 just to find out who they are; is that your sworn</p> <p>24 testimony?</p> <p>25 A. I didn't say that, no.</p>	<p>1 violations, this is a nightmare, changed your</p> <p>2 mind?</p> <p>3 A. Yes.</p> <p>4 Q. Why did you change your mind?</p> <p>5 A. After years of abuse, harassment, and</p> <p>6 targeting by the same people over and over, I</p> <p>7 guess basically I had had enough.</p> <p>8 Q. So how long after March 25, 2015 did you</p> <p>9 change your mind? You must have --</p> <p>10 A. I have --</p> <p>11 Q. -- taken a while? It wasn't a few --</p> <p>12 A. I, I haven't any --</p> <p>13 Q. -- it wasn't a few days, was it?</p> <p>14 A. I haven't any --</p> <p>15 MR. MCKEEBY: Objection, compound.</p> <p>16 Q. Was it a few days, a few weeks, a few</p> <p>17 months, or years?</p> <p>18 A. Haven't any idea. That was eight years</p> <p>19 ago.</p> <p>20 Q. So what did you do then, to target these</p> <p>21 groups?</p> <p>22 A. Sent to management certain social media</p> <p>23 posts that would have been incriminating.</p> <p>24 Q. Who assisted you with that?</p> <p>25 A. Assisted.</p>

10 (Pages 37 to 40)

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<p>1 MR. MCKEEBY: Object to the form.</p> <p>2 A. I, I don't, I don't know that anybody</p> <p>3 assisted me. I would have just forwarded it to</p> <p>4 somebody.</p> <p>5 Q. Who was aware of your activities at</p> <p>6 Local 556?</p> <p>7 By the way, have you seen the</p> <p>8 documents relating to this?</p> <p>9 A. I -- no, I haven't. I haven't seen any</p> <p>10 documents.</p> <p>11 Q. Okay. Who are the persons at Local 556</p> <p>12 that were aware of your activities?</p> <p>13 A. I, I, I couldn't tell you right now. That</p> <p>14 was eight years ago.</p> <p>15 Q. So are you swearing under oath you never</p> <p>16 had a conversation or informed Audrey Stone about</p> <p>17 this?</p> <p>18 A. I, I am not, not denying that. And I'm,</p> <p>19 I'm not confirming it. I do not recall having had</p> <p>20 that conversation with Audrey, particularly Audrey</p> <p>21 because she had very little to do with social</p> <p>22 media and would not in any way, shape, or form</p> <p>23 condone any of that activity.</p> <p>24 Q. Condone what activity?</p> <p>25 A. Anything that I would have done.</p>	<p>1 A. I, I believe I did, yes.</p> <p>2 Q. And you turned her in as well, correct?</p> <p>3 A. To be honest with you, I don't remember</p> <p>4 that at all.</p> <p>5 Q. Who do you remember turning in?</p> <p>6 A. The only pers -- particular person that I</p> <p>7 can remember turning in would have been Jeanna</p> <p>8 Jackson. I'm not saying that that's an inclusive</p> <p>9 list, but that's the only person that comes to</p> <p>10 mind at this moment. Again, this is eight years</p> <p>11 ago.</p> <p>12 Q. What about Mike Casper?</p> <p>13 A. More than likely Mike Casper, given an</p> <p>14 opportunity, I would have, yes.</p> <p>15 Q. And why Mike Casper, if you had been given</p> <p>16 the opportunity?</p> <p>17 A. Mike Casper was an adver -- has been an</p> <p>18 adversary for many years, causing a great deal of</p> <p>19 dysfunction and destruction to both Southwest and</p> <p>20 TWU.</p> <p>21 Q. And so you would have targeted Ms. Jackson</p> <p>22 and, if given the opportunity, Mr. Casper. Anyone</p> <p>23 else?</p> <p>24 A. When you say "targeted," I don't know that</p> <p>25 I necessarily agree with the term you're using.</p>
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<p>1 Q. She would not have condoned what you did?</p> <p>2 A. She would not have condoned anything that</p> <p>3 I had done, no.</p> <p>4 Q. Why not?</p> <p>5 A. Because that's just not how she operates.</p> <p>6 Q. Who else at Local 556 would have known of</p> <p>7 your activities?</p> <p>8 A. I don't know.</p> <p>9 Q. So Brett Nevarez was not aware?</p> <p>10 A. Perhaps.</p> <p>11 Q. So you turned in how many people to</p> <p>12 Southwest Airlines?</p> <p>13 A. I haven't any idea.</p> <p>14 Q. How did you identify the people who were</p> <p>15 opponents of Audrey Stone and her slate or recall</p> <p>16 petition supporters or union objectors?</p> <p>17 A. I'm sorry, repeat the question, please.</p> <p>18 Q. Yes. How did you identify those three</p> <p>19 classes of people?</p> <p>20 A. Anybody that would have been turned in</p> <p>21 would have had nothing do with being an objector.</p> <p>22 I, I don't even know -- we, we -- the names of the</p> <p>23 objectors were not public or, or never disclosed</p> <p>24 unless they identified themselves.</p> <p>25 Q. You knew Charlene Carter was an objector?</p>	<p>1 Did I turn them in using -- turn in their words to</p> <p>2 Southwest, yes.</p> <p>3 Q. Okay. Well, I'll, I'll tell you that I do</p> <p>4 include that within the use of target. Do you</p> <p>5 have a problem with that?</p> <p>6 A. No.</p> <p>7 Q. Okay. And what was your nickname for</p> <p>8 Mr. Casper?</p> <p>9 A. I, I don't know. I didn't really have</p> <p>10 one.</p> <p>11 Q. You never referred to him as a ghost scab?</p> <p>12 A. Oh, certainly I probably would have used</p> <p>13 those words, yes.</p> <p>14 Q. Any other nicknames?</p> <p>15 A. Not that come to mind.</p> <p>16 Q. So when you say that Audrey Stone did not</p> <p>17 or would not have supported what you were doing,</p> <p>18 is it your belief that she thought, like when you</p> <p>19 were charged, that their activities were protected</p> <p>20 union speech?</p> <p>21 MR. GREENFIELD: Objection, form.</p> <p>22 Q. Is that how you understood it?</p> <p>23 A. I, I, I don't know what she would have</p> <p>24 thought.</p> <p>25 Q. Okay. I thought you were telling us you</p>

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<p>1 did. You knew she would object, but you don't</p> <p>2 know why she would object to what you were doing;</p> <p>3 is that what you're now telling us?</p> <p>4 MR. GREENFIELD: Objection, form.</p> <p>5 A. Audrey would have objected to me -- to, to</p> <p>6 me turning in screenshots, I believe.</p> <p>7 Q. And why, why do you believe that she would</p> <p>8 object to you turning in union members?</p> <p>9 A. Because she's a union president.</p> <p>10 Q. And the union should not be turning in</p> <p>11 union members to management, correct, according</p> <p>12 to --</p> <p>13 A. If --</p> <p>14 Q. -- Ms. Stone?</p> <p>15 MR. GREENFIELD: Objection, form.</p> <p>16 A. I, I, I, I would not have heard those</p> <p>17 words from her, but as union president, I believe</p> <p>18 that she would not condone me having done what I</p> <p>19 had done.</p> <p>20 Q. Would she go --</p> <p>21 A. Audrey did not par -- Aud -- Audrey did</p> <p>22 not participate in social media in any way, shape,</p> <p>23 or form.</p> <p>24 Q. Are you, are you sure about that?</p> <p>25 A. Pretty sure.</p>	<p>1 social media, it was private, it was supposed to</p> <p>2 be a, a set group of people?</p> <p>3 A. Correct.</p> <p>4 Q. And do you know if Ms. Stone agreed with</p> <p>5 you about that?</p> <p>6 A. I -- we never discussed that.</p> <p>7 Q. What was the result -- first of all, who</p> <p>8 at Southwest management did you talk to about</p> <p>9 targeting these three groups?</p> <p>10 MR. MCKEEBY: Object to the form of</p> <p>11 the question.</p> <p>12 You can answer.</p> <p>13 A. I, I -- whoever I sent them to. I don't</p> <p>14 know whether it was the social media violation</p> <p>15 department or a, a vice president, director,</p> <p>16 base man -- probably not base manager, I doubt</p> <p>17 that I would have included them.</p> <p>18 Q. You don't recall who you sent it to?</p> <p>19 A. No.</p> <p>20 Q. How did you decide who to send it to?</p> <p>21 Maybe that will help us narrow it down.</p> <p>22 A. Probably the people that I would have had</p> <p>23 some -- the closer -- more of a working</p> <p>24 relationship with and felt more comfortable with.</p> <p>25 Q. And what -- who would fall within that</p>
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<p>1 Q. You haven't seen her posts on the core</p> <p>2 team Facebook page?</p> <p>3 A. For -- if, if, if she was in there for</p> <p>4 a very, very brief time. And, again, let's talk</p> <p>5 about what we consider social media. Right now</p> <p>6 we're in a, in a, in a, a Zoom meeting with one,</p> <p>7 two, three, four, five, six, seven of us; is this</p> <p>8 considered social media? I don't consider this</p> <p>9 social media, any more than I considered the core</p> <p>10 group social media.</p> <p>11 We were a close, private group of</p> <p>12 people. That was our virtual conference room. As</p> <p>13 flight attendants that are all over the country,</p> <p>14 working all different hours, all different days,</p> <p>15 we don't have the ability to assemble in the, in</p> <p>16 the union hall. We don't -- so Facebook provides</p> <p>17 virtual conference rooms, is how I viewed the core</p> <p>18 group. So I never considered it a social media</p> <p>19 violation because it wasn't social media.</p> <p>20 Q. It wasn't social --</p> <p>21 A. Any more than that I --</p> <p>22 Q. Go ahead, I'm sorry.</p> <p>23 A. -- any more than I considered this group</p> <p>24 right now social media.</p> <p>25 Q. One of the reasons you didn't consider it</p>	<p>1 group?</p> <p>2 A. Possibly our, our -- I don't believe Sonya</p> <p>3 Lacore would have been vice president at that</p> <p>4 point. I think she was a director. Mike Sims</p> <p>5 would have been a director.</p> <p>6 Q. And who would the director have been at</p> <p>7 that point? Is that Hafner?</p> <p>8 A. What I just said, so -- no, I, I believe</p> <p>9 Sonya Lacore would have been a director at that</p> <p>10 point --</p> <p>11 Q. Okay.</p> <p>12 A. -- as would have been Mike Sims.</p> <p>13 Q. Okay. So you, you think you would have</p> <p>14 spoken to either Ms. Lacore or Mr. Sims or both?</p> <p>15 A. Probably not spoken. Probably would have</p> <p>16 forwarded an e-mail.</p> <p>17 Q. As you sit here today, you don't recall</p> <p>18 any conversations?</p> <p>19 A. No. Nothing comes to mind, no.</p> <p>20 Q. Earlier you said that Mike Casper caused</p> <p>21 dysfunction and disruption. What did he do to</p> <p>22 cause dysfunction and disruption?</p> <p>23 A. Probably 20 plus years ago, he started,</p> <p>24 before the, the current platforms of social media</p> <p>25 existed, something on Yahoo, using Yahoo, it was</p>

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<p style="text-align: right;">Page 49</p> <p>1 called a Yahoo groups, and with he being a fairly 2 senior employee, a fairly well spoken employee, 3 and a fairly well written employee, I think he 4 gathered or got more respect than was probably 5 deserving. He'd always be a malcontent. I, on 6 the other hand, consider myself as well as others 7 supportive of the company, and he, through 8 spreading misinformation and lies to thousands -- 9 well, at that time it was probably 2,000 people, 10 it was, in my opinion, was very damaging. 11 Q. That was 20 years ago. What since then? 12 A. Well, then he would have, he would have -- 13 once the, the newer technology came along, he 14 would have participated in that, Facebook, 15 different flight attendant Facebook groups. 16 Q. You said he would have. Did he? 17 A. Yes. 18 Q. And can you give us any specifics of the 19 dysfunction and disruption he caused in that 20 regard? What did he say? 21 A. Well, I can't tell you specifically. I, I 22 don't know. Generally contract time would have 23 been an appropriate time, union officer election 24 time would have been appropriate time, 25 particularly at contract time, when he would be</p>	<p style="text-align: right;">Page 51</p> <p>1 understand my preamble here? 2 A. Yes. 3 Q. And this is an e-mail from Audrey Stone to 4 Sonya Lacore, and it says, Head's up, we have a 5 movement of objectors, those that resigned from 6 their union membership and receive a small 7 reimbursement of their dues, and the board agreed 8 a nonmember of 556 cannot represent TWU 556. 9 And there's more. But the point is, 10 she's contacting Sonya Lacore, saying that the 11 union wants the objectors off of any joint 12 Southwest Airlines union committee. 13 Okay? You understand so that so far? 14 A. I did. 15 Q. Do you recall anything about that? 16 A. I, I never -- I've never seen the e-mail. 17 I remember vaguely the circumstances -- the 18 situation. 19 Q. Okay. Tell me what you recall about the 20 circumstances. 21 A. Well, I, too, was on a joint committee of 22 TWU and Southwest Airlines, and it's just -- and 23 the fact that it's a, a nonmember of a union 24 certainly would not participate in a union event. 25 And particularly somebody that would be an</p>
<p style="text-align: right;">Page 50</p> <p>1 misrepresenting the details of our contracts to 2 thousands of people. 3 Q. And that would -- 4 A. And I don't -- 5 Q. -- have been what? What year was that? 6 A. I don't know. My last dealing with Mike 7 Casper was probably in, I'm guessing, 2012 or '13, 8 to my -- to the best of my knowledge. 9 Q. Let me show you another document. This is 10 Trial Exhibit 146. Let's skip to the begin -- 11 beginning of this e-mail thread. Try and make it 12 a little bigger, see if that helps. 13 A. I see -- I -- 14 Q. Can you see this? 15 A. Can you scroll it up a little bit? My 16 phone's blocking it. 17 Q. I can. I can. 18 A. Okay. 19 Q. I put my cursor by where I'm -- 20 A. Uh-huh. 21 Q. Okay. You're not -- sir, you're not on 22 this e-mail, and I'm asking you about this to see 23 whether or not you happen to have seen this e-mail 24 or recall seeing it or if you recall any 25 discussions about it. And you get -- you</p>	<p style="text-align: right;">Page 52</p> <p>1 objector had, has denounced their, their 2 membership to the union. 3 Q. Do you recall anything else? 4 A. No. 5 Q. Do you recall whether or not Southwest 6 Airlines took any action to ensure that those 7 objectors, in fact, were not on committees? 8 A. I, I don't know how it played -- I, I know 9 that he was -- did not continue from what I, from 10 what I heard just through the grapevine, did not 11 continue on that committee. I, I know nothing 12 about the mechanics or how it happened. 13 Q. Okay. Did you exchange e-mails on a 14 regular basis with Sonya Lacore? 15 A. Yes. 16 Q. And what time period would that have been? 17 A. Probably 2013 through, I, I don't know, 18 20 -- I -- probably wherever she became vice 19 president or shortly, shortly thereafter, I would 20 guess. 21 Q. Okay. And what prior -- 22 A. I mean, I, I con -- I continued to have 23 e-mails with her over the years of various topics. 24 Q. And that, that was gonna be my next 25 question.</p>

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<p>1 What, what were the topics of your</p> <p>2 discussions?</p> <p>3 A. Just whatever current event, whatever</p> <p>4 needed to be discussed. I mean, nothing, nothing</p> <p>5 specific.</p> <p>6 Q. And Ms. Lacore, what was her position at</p> <p>7 Southwest Airlines?</p> <p>8 A. Most of the time when I dealt with her</p> <p>9 more regularly, she was a, a director.</p> <p>10 Q. A director of what?</p> <p>11 A. Director of inflight.</p> <p>12 Q. And explain to the jury what, what that</p> <p>13 means, to be director of inflight.</p> <p>14 A. I don't really know what the role is, to</p> <p>15 be honest with you. It's a notch below a vice</p> <p>16 president and one notch above a manager. So --</p> <p>17 Q. It just --</p> <p>18 A. -- I don't know what her specific duties</p> <p>19 were.</p> <p>20 I, I worked with her on a couple of</p> <p>21 projects that she was basically the liaison or</p> <p>22 oversaw what we were doing. So that's when I had</p> <p>23 most of my contact with her.</p> <p>24 Q. When you say she was overseeing what you</p> <p>25 were doing, what do you mean?</p>	<p>1 Can you see what's marked Exhibit 141</p> <p>2 on the screen?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And, and I'm gonna try and center</p> <p>5 that a little bit. Is that big enough for you or</p> <p>6 should I make it a little bigger?</p> <p>7 A. Where am I -- where do you want me to</p> <p>8 start reading? So my final installment on --</p> <p>9 Q. I -- I'll show you where my cursor is, and</p> <p>10 that's where we're gonna start. But --</p> <p>11 A. Okay.</p> <p>12 Q. -- I'm just basically asking can you read</p> <p>13 this document on your --</p> <p>14 A. Yes. Yes.</p> <p>15 Q. -- on your computer?</p> <p>16 Okay. All right. So this is an</p> <p>17 e-mail from you to Sonya Lacore dated April 29,</p> <p>18 2014, correct?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Yes?</p> <p>21 A. Yes.</p> <p>22 Q. And you sent this to her private e-mail,</p> <p>23 correct?</p> <p>24 A. Apparently so, yes.</p> <p>25 Q. And then it says, So my final installment</p>
Page 54	Page 56
<p>1 A. We worked on a project for a new galley</p> <p>2 for our airplane and, and modifying a, a existing</p> <p>3 galley, so we were in Dallas for a couple of,</p> <p>4 couple of months on a full-time basis doing that.</p> <p>5 Q. Okay.</p> <p>6 A. And she was, for the most part, our, our</p> <p>7 contact person.</p> <p>8 Q. When was that?</p> <p>9 A. That would have been 2013, I think. 2013,</p> <p>10 2014.</p> <p>11 Q. And these e-mail communications with</p> <p>12 Ms. Lacore, do you still have them?</p> <p>13 A. I, I don't ever delete e-mails. I'm sure</p> <p>14 they're somewhere in my, in my folder.</p> <p>15 Q. Do you have a folder that's dedicated to</p> <p>16 Ms. Lacore?</p> <p>17 A. No. I have an e-mail that -- I have a, a</p> <p>18 e-mail box that probably has 300,000 e-mails in it</p> <p>19 that's never are categorized or organized. It's a</p> <p>20 mess.</p> <p>21 Q. Okay. You have a search function, though,</p> <p>22 don't you?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. All right. Let's look at another</p> <p>25 document.</p>	<p>1 on this subject. Shipman stepped up to the plate.</p> <p>2 Does that ring a bell as to what you</p> <p>3 were talking about?</p> <p>4 A. No, I have no idea.</p> <p>5 Q. Okay. The next sentence says, It is</p> <p>6 maddening trying to reason with these sheeple.</p> <p>7 The issue becomes the tumor. I hate to give</p> <p>8 credit for anything, Casper really was the first</p> <p>9 legitimate cancerous tumor that had any</p> <p>10 significant reach, with 1,000 members, but in a</p> <p>11 relatively inactive site. He could be contained.</p> <p>12 Did you write those words?</p> <p>13 A. Yes.</p> <p>14 Q. And so you're telling a senior manager of</p> <p>15 Southwest that Mike Casper is a tumor, a cancerous</p> <p>16 tumor, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And that he could be contained, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Did Ms. Lacore ever report you to</p> <p>21 Southwest Airlines for violating any company</p> <p>22 policies as a result of this communication?</p> <p>23 MR. MCKEEBY: Object to the form of</p> <p>24 the question.</p> <p>25 You can answer.</p>

<p style="text-align: right;">Page 57</p> <p>1 A. I'm not seeing what policy you're talking 2 about, but not to my knowledge. 3 Q. You don't think this violates any 4 Southwest Airlines policies? 5 A. No. 6 Q. Then you say -- Now with FB and twen -- 7 and FB is Facebook? 8 A. Yes. 9 Q. Now with Facebook and 24/7 reach, the 10 characters become more relevant. Corliss 11 particularly is something we have not seen before 12 and is incredibly dangerous. 13 Who is Corliss? 14 A. A Southwest flight attendant. 15 Q. So now you're identifying another 16 Southwest Airlines employee and referring to her 17 as incredibly dangerous, correct? 18 A. Correct. 19 Q. You say, The attitude she spawns is NW 20 airlines in the '80s. People listen and people 21 react. 22 What are you referring to when you say 23 she spawns is Northwest Airlines in the '80s? 24 A. Northwest Airlines was notorious for 25 having very poor labor management regulations.</p>	<p style="text-align: right;">Page 59</p> <p>1 A. Again, I get -- 2 Q. I'm sorry -- 3 A. Again -- 4 Q. -- finish your answer. 5 A. Again, metaphorically speaking. 6 Q. I understand your, your defense of the 7 terms. What I'm pointing out is you've been 8 disciplined for this language, and you felt 9 comfortable using it with a senior member of 10 inflight management at Southwest Airlines, 11 correct? 12 A. Correct. 13 Q. Then it says, I am sure with her dreadful 14 work history, there could be opportunity. 15 And are you there talking about 16 exactly what you mean, as you tell us by targeted 17 assassinations, you're not suggesting you're going 18 to assassinate Ms. Corliss, you're suggesting that 19 taking advantage of her dreadful work history 20 would be the opportunity to get her terminated, 21 correct? 22 A. Ap -- apparently, yes. 23 Q. Then you say, She will play very well to 24 the heavy inner city minority crowd coming onboard 25 soon. She will be their voice. She will be a</p>
<p style="text-align: right;">Page 58</p> <p>1 Q. They had a lot of -- 2 A. And histor -- and, and historically at 3 Southwest Airlines we did not have that. 4 Q. Okay. And so you were warning Ms. Lacore 5 that Corliss spawns an attitude of union problems 6 with management, in your opinion? 7 A. Right. 8 Q. Did you say -- 9 A. In my opinion, correct. 10 Q. Did you say right? I'm sorry. 11 A. In, in my opinion, correct. 12 Q. Okay. And then you said, I am all about 13 targeted assassinations, correct? 14 A. That's what I said. 15 Q. And did Ms. Lacore report you, to your 16 knowledge, to Southwest management for any of the 17 words that you've used that we've read so far in 18 this e-mail? 19 A. Not to my knowledge. 20 Q. Okay. And you know that targeted 21 assassinations gets you in trouble because you got 22 in trouble about that, didn't you? 23 A. That would have been -- I'm looking at the 24 timeline. Apparently so, yes. 25 Q. Okay. So you felt comfortable --</p>	<p style="text-align: right;">Page 60</p> <p>1 huge threat in our upcoming election as well. She 2 plays very well to her crowd and has as much 3 support as anyone I have seen in the past. 4 You wrote those words, and you sent 5 them to Sonya Lacore, correct? 6 A. Appears so, yes. 7 Q. When you say "appears so," what -- why do 8 you say "appears so"? Can you not read? 9 A. No, I can read very well. So, yes, I did. 10 Q. Okay. Well, then what do you mean appears 11 so, if you can read? 12 A. I don't recall having sent it to this 13 e-mail, but obviously I did. 14 Q. Okay. So when you said these wor -- by 15 the way, is Ms. Corliss African-American? 16 A. Yes, she is. 17 Q. And so what you're suggesting to a senior 18 manager at Southwest Airlines is that you target 19 an African-American female who might end up in 20 leadership at the union, correct? 21 A. No. I, I -- Af -- her being 22 African-American has nothing to do with it. 23 Q. No, no, I -- we'll let the jury decide 24 what your words mean in that regard. 25 Listen to my question carefully. You</p>

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<p style="text-align: right;">Page 61</p> <p>1 are telling her about Ms. Corliss, who is an 2 African-American, and you were telling her 3 Southwest Airlines should target for 4 assassination, and by that you mean termination, 5 Ms. Corliss, because she will play very heavy to 6 the inner city minority crowd and will be a huge 7 threat in our upcoming election as well; isn't 8 that correct? 9 A. Yes. 10 Q. Now, when you say "our upcoming election 11 as well," you're referring to the election 12 upcoming in -- I was going to say 2015, but this 13 says 2014. 14 Was the election in 2014 or were you 15 talking about the 2015? 16 A. I would have been talking about the 17 upcoming 2015. I'm not real sure why I would have 18 referenced that as upcoming, because it would have 19 been a year away. Well, it would have been ten 20 months away. 21 Q. I guess it takes time to target people, 22 maybe you needed to get ahead of the game. Could 23 that be it? 24 MR. GREENFIELD: Objection to the 25 form.</p>	<p style="text-align: right;">Page 63</p> <p>1 Your haters is not someone's last name; haters is 2 a group of anyone that's a union member that's not 3 supporting the Stone slate of candidates? 4 A. It's not a matter of supporting them, 5 whether they support them, it's what they do 6 publicly, and particularly in terms of spreading 7 mis -- mistruths and misinformation. 8 Q. Okay. Well, let me try it with that 9 definition then. When you're referring to haters 10 in this e-mail to Ms. Lacore, you're referring to 11 union members who, in your opinion, are spreading 12 untruthful information about the current 13 leadership of the union, correct? 14 A. Correct. 15 Q. And by the way, you don't define the word 16 "haters" in this e-mail, do you? 17 A. No. 18 Q. And yet you feel comfortable enough using 19 it with Ms. Lacore without a definition. Is it 20 fair to assume you felt she would understand 21 exactly what you were talking about? 22 A. I would assume that she would probably 23 know that I was talking to people that were not 24 supportive of the current administration. 25 Q. Okay. And by the way, that's -- the</p>
<p style="text-align: right;">Page 62</p> <p>1 Q. You can answer. 2 A. I don't know what I was thinking. 3 Q. Okay. The -- and as far as you know, 4 Ms. Lacore did not report you to Southwest 5 Airlines for violation of any Southwest policies 6 as a result of this, correct? 7 A. Not that I'm aware of. 8 Q. Do you think that your words here are 9 racist? 10 A. No. 11 Q. Didn't you say -- I'm gonna skip down to 12 the next paragraph -- well, no, let me go to the 13 last sentence here. 14 You're talking about Sam Wilkins, and 15 then you say, Everybody loves her, but then you 16 say, Well, everyone except the haters. 17 And that's a capital H. Who is 18 haters? 19 A. The opposition to the current 20 administration. 21 Q. So union members who oppose the current 22 union leadership? 23 A. Not necessarily oppose but are, are vocal 24 and public. 25 Q. Well, let, let me try it another way.</p>	<p style="text-align: right;">Page 64</p> <p>1 definition that you just gave the word "haters" is 2 the definition I originally -- you tried to say, 3 well, I'm really just talking about people that 4 spread untruthful information, but unfortunately, 5 you've now defined it to say what you're actually 6 talking about is anybody that doesn't support the 7 current administration; isn't that what you just 8 told the jury? 9 A. No, that's -- 10 MR. MCKEEBY: Object to the form of 11 the question. 12 A. That's not what I said. I said and takes 13 and, and spreads mistruths publicly. 14 Q. No, sir. Just now, you said that she 15 would know, that Ms. Lacore would know, we'll put 16 these words up for the jury. Here's your chance 17 to see if you can tell the truth under oath. Did 18 you tell -- did you say that she would understand 19 that haters meant anyone that was opposed to the 20 current union administration? You can answer. 21 A. If that's what I said, that's not entirely 22 what I meant. 23 Q. So -- 24 A. What I meant wa -- Sonya, Sonya would be 25 well aware of the people that were extremely vocal</p>

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<p style="text-align: right;">Page 65</p> <p>1 publicly about our, our current administration. 2 There was no secret about that. 3 Q. The next paragraph says, Social media is 4 by far the major source of reach and must be used 5 to our advantage. 6 Those are words you used? 7 A. Yes. 8 Q. And then you go down to the next 9 paragraph, Cancer is a dangerous thing and must 10 being eradicated whenever possible or it spreads. 11 By the way, if you go back up to that 12 first paragraph, the cancer example you gave was 13 as to Mr. Casper, right? 14 A. Yes. 15 Q. And is that what you're referring to here 16 or are you talking about a larger group of people? 17 A. Well, I'm talking about a movement. 18 Casper would have been a pioneer in that movement. 19 Q. You said, I would highly encourage 20 targeting people, and a one-day detective with a, 21 with a video camera is a very cheap investment. 22 Is that the recommendation you were 23 making to Ms. Lacore? 24 A. Apparently so, yes. 25 Q. Okay. When you say "apparently," what do</p>	<p style="text-align: right;">Page 67</p> <p>1 have a, a question for your answer. 2 What were you trying to avoid by 3 sending it to her personal e-mail? 4 A. The, the filters that it may go through at 5 headquarters. As opposed to not going directly to 6 her, I don't -- you don't know who read things at 7 headquarters. 8 Q. Why would you be concerned about someone 9 reading this? 10 A. It was a -- 11 Q. If you're not doing anything wrong, why 12 are you concerned? 13 A. It wa -- it was a personal, personal 14 communication between two people. 15 Q. All communications between two people fall 16 within that definition, sir. Why are you avoiding 17 sending this through the company e-mail? 18 MR. GREENFIELD: Objection, form. 19 A. I think I answered the question. 20 Q. So then you say -- 21 A. If I send, if I send an e-mail, if I send 22 an e-mail currently to a vice president, I don't 23 know how many people -- at that time I don't 24 believe she was a vice president, but I don't know 25 who filters the e-mail before it gets to that</p>
<p style="text-align: right;">Page 66</p> <p>1 you mean? 2 A. I don't remember having made that comment, 3 but it's here, so obviously I did. 4 Q. Okay. You, you don't disagree that that's 5 what you wrote? 6 A. No. 7 Q. Then when -- then you say, While I have 8 sent this to a personal e-mail -- I'm going to 9 stop right there on that phrase. You have 10 intentionally sent this to her personal e-mail 11 instead of her business e-mail so it would be less 12 likely to be discovered, correct? 13 A. Correct. 14 Q. And are you knowledgeable enough to know 15 that when there's an SEC investigation or a 16 Department of Labor investigation or a lawsuit 17 where documents are demanded of Southwest Airlines 18 or the union, that any e-mails would be picked up, 19 and you were trying to avoid that? 20 A. No, not, not, not at all. First of all -- 21 Q. Well -- 22 A. -- to answer your que -- 23 Q. Wait, let me get -- 24 A. -- to answer your -- 25 Q. -- let me get to ask a question, so we, we</p>	<p style="text-align: right;">Page 68</p> <p>1 person. 2 Q. Do you see -- 3 A. And I -- for that reason, that reason, I, 4 I, I prefer not to use company communication. 5 Q. And, by the way, would you be surprised 6 there was no filter at all, sir? You know so much 7 about Ms. Lacore, she's your pen pal, and you're 8 telling us under oath there was -- there were 9 people that would be filtering her e-mails; is 10 that your testimony? 11 MR. MCKEEBY: Object to the form of 12 the question and the characterization. 13 You may answer. 14 A. I don't know whether there were filters or 15 not. 16 Q. So you didn't know if there were filters, 17 but out of an abundance of caution about these 18 unknown filters, you were sending this to her 19 personal e-mail address, correct? 20 A. Correct. 21 Q. By the way, you sent other e-mails that 22 she was on to her business address. Why would you 23 choose some to go to her business e-mail and 24 others like this go to her personal e-mail? 25 A. I don't know.</p>

17 (Pages 65 to 68)

<p style="text-align: right;">Page 69</p> <p>1 Q. You have no idea?</p> <p>2 A. No.</p> <p>3 Q. You did that, but you don't know why,</p> <p>4 correct?</p> <p>5 A. I don't know why I did something in April</p> <p>6 of 2014, correct.</p> <p>7 Q. No, I didn't ask it that way, but at any</p> <p>8 time can you tell us why you would send one e-mail</p> <p>9 to her business address and another to her</p> <p>10 personal address? Pick any time period from the</p> <p>11 beginning of time to this very moment.</p> <p>12 A. To be honest with you, probably for --</p> <p>13 MR. GREENFIELD: Objection, form.</p> <p>14 A. -- the same reason that I, I have multiple</p> <p>15 e-mail set up myself for no particular reason. I</p> <p>16 haven't any idea why I receive e-mail from</p> <p>17 Southwest Airlines on one particular account</p> <p>18 versus another.</p> <p>19 Q. And, and you can't think of any reason</p> <p>20 about this e-mail that it's sensitive and</p> <p>21 therefore you would want to keep it a secret,</p> <p>22 correct?</p> <p>23 A. Correct.</p> <p>24 Q. And yet let's see what you say.</p> <p>25 I certainly am not awaiting comments</p>	<p style="text-align: right;">Page 71</p> <p>1 in her position to respond to me. Again, this is</p> <p>2 me sharing my thoughts with her, nothing more. I</p> <p>3 would never expect her to have responded or</p> <p>4 commented, particularly -- well, commented on</p> <p>5 that, period. And she never did, to my knowledge.</p> <p>6 Q. Well, because you told her not to. Let's</p> <p>7 have this conversation off --</p> <p>8 A. No.</p> <p>9 Q. -- off record?</p> <p>10 A. No. I, I was telling her, and, and I've</p> <p>11 had many communications with her over the years</p> <p>12 on, on various topics where I don't ex -- I don't</p> <p>13 expect a re -- I don't have an ego that needs a</p> <p>14 reply to every communication that I send to her.</p> <p>15 If I have an idea or a thought, I don't need --</p> <p>16 she's a busy person, she's got a lot -- she</p> <p>17 probably gets hundred of e-mails a day, and I</p> <p>18 don't expect a reply or need a reply.</p> <p>19 Q. Do, do a lot of people at Southwest</p> <p>20 Airlines have access to her personal e-mail?</p> <p>21 A. I wouldn't have any --</p> <p>22 Q. To your knowledge?</p> <p>23 A. I wouldn't have any idea.</p> <p>24 Q. But you did, right?</p> <p>25 A. Apparently, yes.</p>
<p style="text-align: right;">Page 70</p> <p>1 on topics of above. I totally get the paper trial</p> <p>2 thing, and nobody can be trusted.</p> <p>3 Did I read that right?</p> <p>4 A. Yes.</p> <p>5 Q. And so you're worried about your -- you've</p> <p>6 told us now. You couldn't remember, but now</p> <p>7 you've told us in what you wrote; you didn't want</p> <p>8 a paper trail about these communications, did you?</p> <p>9 A. I didn't want to put -- basically this was</p> <p>10 a one-sided communication, was not intended nor</p> <p>11 expected to be -- I didn't want her to think that</p> <p>12 a reply was to be expected. Obviously I'm using</p> <p>13 some inflammatory -- some colorful language, and I</p> <p>14 would not expect her in her position to respond to</p> <p>15 that. So I was basically sharing my thoughts with</p> <p>16 her. Nothing more.</p> <p>17 Q. And when you say, I totally get the paper</p> <p>18 trial thing, aren't you, in fact, referring to you</p> <p>19 don't want a paper trail to be discovered by</p> <p>20 others --</p> <p>21 A. No, I didn't want --</p> <p>22 Q. -- regarding this ca -- I'm sorry?</p> <p>23 A. Sorry. I didn't want her to think that</p> <p>24 she would -- that I would be expecting an e-mail</p> <p>25 because I would not expect her to respond to me,</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. And then it says, Talk to you soon and</p> <p>2 hope we can get together soon.</p> <p>3 Did you?</p> <p>4 A. Yes.</p> <p>5 MR. MCKEEBY: Did she say that or did</p> <p>6 they get together? Object to form.</p> <p>7 Q. I'm just reading from your e-mail, sir.</p> <p>8 A. Well, I, I worked with her quite a lot on,</p> <p>9 on -- which is what I was referring to. We worked</p> <p>10 very closely on a couple of projects.</p> <p>11 Q. Do you recall having conversations with</p> <p>12 her about the subject matter of this e-mail?</p> <p>13 A. No.</p> <p>14 Q. Have you seen Ms. Lacore's deposition?</p> <p>15 A. No.</p> <p>16 Q. And before --</p> <p>17 MR. MCKEEBY: Bobby, can we take a,</p> <p>18 can we take a break in a minute, if you're done</p> <p>19 with this document?</p> <p>20 MR. PRYOR: Sure. Any -- anytime --</p> <p>21 by the way, sure. Anytime anyone needs a break,</p> <p>22 that's fine.</p> <p>23 MR. GREENFIELD: Well, let, let me</p> <p>24 just, let me just take this as a moment for one</p> <p>25 second. Ms. Court Reporter, what, what is the</p>

<p style="text-align: right;">Page 73</p> <p>1 time of the deposition at?</p> <p>2 THE VIDEOGRAPHER: This is Lisa, and</p> <p>3 we've used 1 hour and 19 minutes.</p> <p>4 MR. GREENFIELD: Okay. Then at this</p> <p>5 time, the TWU Local 556, we object to the</p> <p>6 continuance of this deposition and move to strike</p> <p>7 any additional te -- testimony. It is now 5:32 on</p> <p>8 the Sunday night before the 4th of July. The</p> <p>9 plaintiff has known of their belief that</p> <p>10 Mr. Talburt was a -- was relevant to this case</p> <p>11 since March 29th, 2019, when he was listed as a</p> <p>12 potential witness in their initial disclosures.</p> <p>13 Plaintiff had well over two years to dep -- depose</p> <p>14 Mr. Talburt, but failed to do so until long after</p> <p>15 the close of discovery on July 5th, 2021. The</p> <p>16 court limited depositions of Southwest witnesses</p> <p>17 to one hour. We believe the court intended to or</p> <p>18 should have limited this deposition to the same</p> <p>19 one-hour time period.</p> <p>20 MR. PRYOR: Is that what you wanted to</p> <p>21 break for or are you actually wanting a break?</p> <p>22 MR. GREENFIELD: No, that, that was</p> <p>23 me. Mr. McKeeby asked for the break. But</p> <p>24 objection --</p> <p>25 MR. PRYOR: Okay. All right.</p>	<p style="text-align: right;">Page 75</p> <p>1 not taking fourth when asked as routine.</p> <p>2 What are you talking about there?</p> <p>3 A. So in our contract in 2007, perhaps, prior</p> <p>4 to that time, anytime that there was a deadheading</p> <p>5 crew of flight attendants, they -- the company</p> <p>6 would block two seats, and one seat the jump --</p> <p>7 the third flight attendant would be required to</p> <p>8 sit in the jump seat. And in that contract it was</p> <p>9 changed, and we were provided three blocked seats</p> <p>10 as opposed to two blocked seats. So I'm assuming</p> <p>11 what that dealt with was when they negotiated</p> <p>12 that, and that's confirmed by our negotiating</p> <p>13 team, they were under the -- they believed, and,</p> <p>14 again, this is a, a good -- and this points to</p> <p>15 much of the misinformation and dysfunction of our</p> <p>16 union that I have alluded to in the past, they</p> <p>17 believed, as I was told, the flight attendants</p> <p>18 would, quote/unquote, do the right thing in the</p> <p>19 case of an oversold flight and take the jump seat.</p> <p>20 We are getting paid for that. And they and the</p> <p>21 company both believe that that to be case.</p> <p>22 Once that was signed into ink, that</p> <p>23 became a, a joke, and flight attendants basically</p> <p>24 because of social media, in my opinion, were, were</p> <p>25 discouraged from ever taking the jump seat, thus</p>
<p style="text-align: right;">Page 74</p> <p>1 MR. GREENFIELD: We were at a breaking</p> <p>2 point, so I wanted to lodge my objection at that</p> <p>3 time, but I didn't want to interrupt you while you</p> <p>4 were --</p> <p>5 MR. PRYOR: I understand.</p> <p>6 MR. GREENFIELD: -- in the middle of a</p> <p>7 document, Mr. Pryor.</p> <p>8 MR. PRYOR: Okay. I'll going back to</p> <p>9 share screen then.</p> <p>10 MR. MCKEEBY: Well, I really want a</p> <p>11 break because I need to use the restroom.</p> <p>12 MR. PRYOR: Oh, okay. Let's take a</p> <p>13 break.</p> <p>14 THE VIDEOGRAPHER: Going off the</p> <p>15 record at 5:33.</p> <p>16 (Recess).</p> <p>17 THE VIDEOGRAPHER: We are back on the</p> <p>18 record with Clip 2 at 5:38.</p> <p>19 Q. Mr. Talburt, let's go back to Trial</p> <p>20 Exhibit 141. And, and now I'm at the top of that</p> <p>21 document. Can you see the e-mail between yourself</p> <p>22 and Audrey Stone?</p> <p>23 A. Yes.</p> <p>24 Q. And you're telling her, So this is part of</p> <p>25 a thread between Sonya and I re a Facebook post re</p>	<p style="text-align: right;">Page 76</p> <p>1 denying the company an opportunity for additional</p> <p>2 revenue and possibly leaving people behind at the</p> <p>3 gate. So I'm sure that's what I was referring to.</p> <p>4 Q. Okay. And then --</p> <p>5 A. And, and --</p> <p>6 Q. Go ahead. Were you done?</p> <p>7 A. I, I was gonna say and, and now, in</p> <p>8 reading the last sentence there in the first</p> <p>9 paragraph where it says, not only no, but hell no,</p> <p>10 if a ticket agent were to ask a flight attendant</p> <p>11 to take jump, they take the jump seat on oversold</p> <p>12 flight, they would be very compatative -- combata</p> <p>13 -- combatative (sic) over, over that request.</p> <p>14 Q. So you say, I had developed a very close</p> <p>15 working relationship with Sonya, and this subject</p> <p>16 was something we had talked about. Note, once</p> <p>17 again using the targeted assassination metaphor</p> <p>18 and being quite clear about what I was referring</p> <p>19 to. As indicated on the bottom, I did not receive</p> <p>20 nor expect to receive a rely, as is always the</p> <p>21 case when talking, quote, off the record in a</p> <p>22 print environment.</p> <p>23 I want to go back and ask you</p> <p>24 questions about that.</p> <p>25 A. Uh-huh.</p>

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<p>1 Q. You sent this to Ms. Stone; one of the 2 reasons was to point out in the e-mail below, you 3 used targeted assassination metaphor, and at 4 another point in time you'd got in trouble for it, 5 but here, this shows you had used it before with 6 senior management, not gotten in trouble, and it 7 was clear you were talking about terminating 8 someone's job, not killing someone; is that 9 accurate?</p> <p>10 A. Not necessarily terminating somebody's 11 job, but basically being held accountable, yes.</p> <p>12 Q. Other than that, either terminating their 13 job or holding them accountable, my statement was 14 an accurate summary?</p> <p>15 A. Yes.</p> <p>16 Q. And then it says about talking off the 17 record, what do you mean by that? Isn't that what 18 I was asking you about before, that you don't want 19 a record of this?</p> <p>20 A. Yes. Ob -- ob -- obviously you asked me a 21 question earlier, and I, I, through this 22 unfortunate process, have learned that obviously 23 people like yourself have access, ac -- access to 24 private information.</p> <p>25 Q. So because I have access to private</p>	<p>1 able to read this? Should I make it a little 2 bigger?</p> <p>3 A. No, I'm, I'm fine.</p> <p>4 Q. Okay. And this is an e-mail from you to 5 whom?</p> <p>6 A. I don't know. I don't see it.</p> <p>7 Q. Okay. Let me scroll up. Do you know if 8 you sent this to Audrey Stone, and her response 9 was Not relevant?</p> <p>10 A. Okay.</p> <p>11 Q. I'm, I'm asking you if you agree that's 12 what's ha -- I, I, I think it is, but I need to 13 tell me that's what you think as well.</p> <p>14 A. That's, that's what it looks like, yes.</p> <p>15 Q. Okay. All right. So at the bottom, 16 there's something that says from Mike Hafner to 17 Brian, and that's you, right?</p> <p>18 A. I'm sorry, where are we looking at?</p> <p>19 Q. Okay. Can you see my cursor?</p> <p>20 A. Yes, it's over here.</p> <p>21 Q. Okay. So if you go to the bottom, on 22 August 16th, 2013, at 6:21 a.m., it appears that 23 you received an e-mail from Mike Hafner that was 24 also sent to Matthew, and I don't know how to 25 pronounce the last name. Do you see that?</p>
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<p>1 information, that's unfair to you and you have to 2 tell the truth?</p> <p>3 A. No, that's, that's not what I'm saying at 4 all. We shouldn't -- it -- in my obvious naive 5 way of thinking would have never thought that we 6 would have even had to discuss it.</p> <p>7 Q. So in your naive way of thinking, in fact, 8 you told Ms. Stone that the reason you did this 9 communication the way you did with Ms. Lacore was 10 to keep it off the record; you even put quotes 11 around it, true?</p> <p>12 A. Yes, apparently. Yes.</p> <p>13 Q. Let's get a different document.</p> <p>14 By the way, you sent this to her, to 15 Ms. Stone five months later?</p> <p>16 A. Okay.</p> <p>17 Q. You didn't send it to her at the time, 18 right?</p> <p>19 A. That's what the dates say, yes.</p> <p>20 Q. Let me show you another trial exhibit.</p> <p>21 Okay. I don't know if I just called up a document 22 you can see or not. Is it -- I can make it bigger 23 if it's on there.</p> <p>24 A. I, I -- yeah, I --</p> <p>25 Q. Okay. This is Trial Exhibit 26. Are you</p>	<p>1 A. No. I'm sorry, I don't see what you're, 2 you're pointing to.</p> <p>3 Q. Okay. So you see my cursor?</p> <p>4 A. Move it.</p> <p>5 Q. So go to the very bottom. See where it 6 says Trial Exhibit 26?</p> <p>7 A. Oh, yes. Yeah, my phone is blocking it. 8 I can't see it.</p> <p>9 Q. Okay.</p> <p>10 A. You have to scroll up.</p> <p>11 Q. All right. Fair enough.</p> <p>12 And if you look to the left of that, 13 you see where it's an e-mail from Mike Hafner that 14 you're carbon copied on at --</p> <p>15 A. Okay.</p> <p>16 Q. -- 6:21 a.m.?</p> <p>17 A. Yes.</p> <p>18 Q. And I, I don't have anything else about 19 that e-mail, but if you look at the e-mail above, 20 are you able to tell us any recollection you have 21 of what Mr. Hafner was sending you? If it helps, 22 the subject line says Re: Facebook.</p> <p>23 A. Okay.</p> <p>24 Q. Do you recall what Mr. Hafner was 25 communicating to you in that e-mail?</p>

20 (Pages 77 to 80)

Brian Talburt

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<p>1 A. I, I don't know. I mean, I know what</p> <p>2 my -- I know what the e-mail is about, but I don't</p> <p>3 know what Hafner was responding, no.</p> <p>4 Q. Okay. So -- and, and at that time</p> <p>5 Mr. Hafner was in what position, 2013?</p> <p>6 A. He would have been, he would have been the</p> <p>7 vice president of inflight services.</p> <p>8 Q. And that's a member of senior management</p> <p>9 of Southwest Airlines?</p> <p>10 A. Yes.</p> <p>11 Q. And you write to Ms. Stone, I found this.</p> <p>12 It really has nothing to do with the topic at</p> <p>13 hand.</p> <p>14 And, by the way, she seems to confirm</p> <p>15 that in her response. Do you remember what the</p> <p>16 topic at hand was?</p> <p>17 A. No.</p> <p>18 Q. Then -- okay. Then you go on to say, but</p> <p>19 it is an illustration of casual, behind-the-scene</p> <p>20 conversations we have and particularly re social</p> <p>21 media.</p> <p>22 That's what you wrote, correct? Do I</p> <p>23 need to make it bigger?</p> <p>24 A. No, no, I'm just --</p> <p>25 Q. You agree that that's what you wrote?</p>	<p>1 Sonya Lacore you were talking to in that previous</p> <p>2 e-mail marked Trial Exhibit 141 about targeting</p> <p>3 for assassination union members such as Mr. Casper</p> <p>4 and Ms. Corliss, correct?</p> <p>5 A. The same person, yes.</p> <p>6 Q. And then it says, had a meeting last</p> <p>7 summer with VdV.</p> <p>8 I think I read that. Who is VdV?</p> <p>9 A. Mike Van de Ven.</p> <p>10 Q. Okay. And Van de, Van de Vere?</p> <p>11 A. Van de Ven.</p> <p>12 Q. Van de Ven.</p> <p>13 And that's the person you told us</p> <p>14 before you, you didn't, didn't know?</p> <p>15 A. I never told you I didn't know him.</p> <p>16 Q. Or you didn't have any relationship with</p> <p>17 him?</p> <p>18 A. I have no, I have no personal relationship</p> <p>19 with him, yes.</p> <p>20 Q. But you were --</p> <p>21 A. I've had one meeting, I've, I've had one</p> <p>22 meeting with him in his 35 years here, and this is</p> <p>23 what that's referencing.</p> <p>24 Q. Okay. Well, when you said "personal</p> <p>25 relationship," at the beginning you told us you</p>
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<p>1 A. Yes.</p> <p>2 Q. And then you write, I along with Mike and</p> <p>3 Sonya had a meeting last summer with VdV to</p> <p>4 discuss social media as a tool.</p> <p>5 Did you write that?</p> <p>6 A. Yes.</p> <p>7 Q. And is Mike, Mike Sims?</p> <p>8 A. No, Mike Hafner.</p> <p>9 Q. Oh, I'm sorry. Mike Hafner.</p> <p>10 And is Sonya, Sonya Lacore?</p> <p>11 A. Yes.</p> <p>12 Q. And that's the same Sonya Lacore in the</p> <p>13 last e-mail we looked at that you were talking</p> <p>14 about using social media to target assassinations,</p> <p>15 and, again, to you that means termination or</p> <p>16 otherwise hold them accountable, such as</p> <p>17 Ms. Corliss and Mr. Casper?</p> <p>18 A. This, this particular e-mail is a</p> <p>19 completely different context and a completely</p> <p>20 different -- a comple -- totally different angle</p> <p>21 than what that e-mail said.</p> <p>22 Q. And, and that, that wasn't my question.</p> <p>23 And we can, we can certainly talk about that</p> <p>24 question.</p> <p>25 But my question is: This is the same</p>	<p>1 didn't have personal relationships with these</p> <p>2 people, you had business relationships. And so I</p> <p>3 assume when you were telling us you didn't have a</p> <p>4 relationship with Van de Ven, that you were saying</p> <p>5 you didn't have a business relationship. Is that</p> <p>6 still your testimony?</p> <p>7 A. I don't really consider having one</p> <p>8 30-minute meeting with somebody having a</p> <p>9 relationship.</p> <p>10 Q. Okay. I'm not saying I would --</p> <p>11 A. I had one -- I had --</p> <p>12 Q. All right. I'm not saying I would either.</p> <p>13 I'm asking --</p> <p>14 A. Okay.</p> <p>15 Q. -- you, is it still your testimony or does</p> <p>16 this refresh your recollection?</p> <p>17 A. I said I had no relationship with Mike Van</p> <p>18 de Ven earlier, yes. And I still maintain I have</p> <p>19 no relationship with Mike Van de Ven.</p> <p>20 Q. You say, You are immediately discredited</p> <p>21 as being an over -- overpaid executive. You in</p> <p>22 this world need warriors, another word I use</p> <p>23 frequently as I did on the fateful post, to help</p> <p>24 to deliver the message. He was very</p> <p>25 interested/intrigued.</p>

21 (Pages 81 to 84)

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Brian Talburt

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<p>1 Okay. Let's, let's cover those, those</p> <p>2 sentences. When you say, as I did on the fateful</p> <p>3 post, what are you talking about?</p> <p>4 A. I don't know.</p> <p>5 Q. It's not about the post, post that used</p> <p>6 targeted assassinations and to terminate them?</p> <p>7 A. No, I --</p> <p>8 Q. It's not the --</p> <p>9 A. -- I don't think so.</p> <p>10 Q. It's not the fucktard that you got</p> <p>11 terminated for?</p> <p>12 A. Oh, that's probably what it was. Looking</p> <p>13 at the dates, yeah.</p> <p>14 Q. Okay. Have we not talked about the</p> <p>15 fucktard one yet? I thought we had.</p> <p>16 A. Yeah, we did.</p> <p>17 Q. Okay. All right. And then it says, to</p> <p>18 help deliver the message. He was very</p> <p>19 interested/intrigued.</p> <p>20 How did he express to you his interest</p> <p>21 and intrigue?</p> <p>22 A. Interested in that he wanted to have a --</p> <p>23 he wanted to discuss it further, which we</p> <p>24 discussed in a 30-minute meeting.</p> <p>25 Q. What do you dis -- recall about that</p>	<p>1 accurate inf -- information. If -- for example,</p> <p>2 if Brian Talburt gets on Facebook and delivers a</p> <p>3 message, it's only going to be -- it's gonna be,</p> <p>4 be immediately discredited. If a group of people</p> <p>5 are, are working in tandem to deliver the message,</p> <p>6 it would be a much more form of -- much more</p> <p>7 effective means of communication and delivering a</p> <p>8 message and reinforcing the message that each was,</p> <p>9 was, was stating.</p> <p>10 Q. Let's look at another exhibit. It's gonna</p> <p>11 be Trial Exhibit 19. And this is a President's</p> <p>12 Message dated April 20, 2015.</p> <p>13 Do you recognize Ms. Stone's picture</p> <p>14 there?</p> <p>15 A. Of course.</p> <p>16 Q. And do you recall this President's</p> <p>17 Message? Feel free --</p> <p>18 A. Can you --</p> <p>19 Q. -- to read as much of it as you can. If</p> <p>20 you need me to scroll up or down, just let me</p> <p>21 know.</p> <p>22 A. Yeah, yeah, scroll, scroll up some more,</p> <p>23 please.</p> <p>24 Q. Okay. I want to talk to you about here</p> <p>25 and then down at the bottom. But whenever you're</p>
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<p>1 30-minute meeting?</p> <p>2 A. It had nothing to do with --</p> <p>3 Q. I understand, it was, it was eight years</p> <p>4 ago.</p> <p>5 A. Yeah. Oh, no, I remember this meeting</p> <p>6 quite well. It had nothing to do with targeted</p> <p>7 assassinations. It had nothing to do with</p> <p>8 targeting anybody. It had -- it was simply</p> <p>9 proposing and my rec -- my suggestion, which was</p> <p>10 not adopted, and this is one employee's</p> <p>11 suggestion, that, first of all, social media is</p> <p>12 the most powerful form of communication known to</p> <p>13 mankind, and when used effectively, it can be</p> <p>14 very, very -- or -- it can be very, very</p> <p>15 effective. And my recommendation to him was to</p> <p>16 have a, a group of -- we had a similar effort</p> <p>17 within our union during contract time, where we</p> <p>18 had certain people that were basically overseeing</p> <p>19 various Facebook pages and delivering a message</p> <p>20 that was appropriate to be delivered. And that</p> <p>21 was my recommendation with Mike Van de Ven, that</p> <p>22 was a very, very difficult time, we were in</p> <p>23 contract negotiations, horrible misinformation was</p> <p>24 being spread, and my recommendation to him was</p> <p>25 have some trusted employees basically spreading</p>	<p>1 ready, I'll, I'll read to you the parts I have</p> <p>2 questions about.</p> <p>3 A. Okay. Go ahead.</p> <p>4 Q. Okay. So a President's Message is</p> <p>5 something that the president of Local 556 sends</p> <p>6 out to all the union members, correct?</p> <p>7 A. Yes.</p> <p>8 Q. And this is one that was sent out by</p> <p>9 Ms. Stone in -- April 20 of 2015?</p> <p>10 A. Yes.</p> <p>11 Q. Based on this document?</p> <p>12 A. Okay.</p> <p>13 Q. And in it, she says -- I'm gonna read</p> <p>14 right here. Do you see where my cursor is?</p> <p>15 A. Yes.</p> <p>16 Q. Your union has been addressing the</p> <p>17 Southwest Airlines social media policy for a long</p> <p>18 time. We have been bringing forward your concerns</p> <p>19 around the lack of clear guidelines on a policy</p> <p>20 that is both vague and undefined. We have</p> <p>21 witnessed inconsistencies around the way the</p> <p>22 policy is applied and the often subjec --</p> <p>23 subjective stance that Southwest management has</p> <p>24 displayed in administering the policy.</p> <p>25 Do you recall that?</p>

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<p style="text-align: right;">Page 89</p> <p>1 A. Yes.</p> <p>2 Q. And that was also your opinion, correct?</p> <p>3 A. Yes, of course.</p> <p>4 Q. And it was the opinion, as far as you</p> <p>5 know, of all of the leadership of the union in</p> <p>6 2015, of Local 556?</p> <p>7 MR. GREENFIELD: Objection, form.</p> <p>8 A. I, I, I don't know. I, I can't speak for</p> <p>9 all of them, but --</p> <p>10 Q. Okay.</p> <p>11 A. -- one would assume so.</p> <p>12 Q. Well, could you, from conversations with</p> <p>13 Brett Nevarez, tell me whether or not you</p> <p>14 understood that to be his opinion as well?</p> <p>15 A. Yes.</p> <p>16 Q. And, and it was, correct?</p> <p>17 A. My -- that's my understanding, yes.</p> <p>18 Q. And that's your understanding from</p> <p>19 conversations with Mr. Nevarez?</p> <p>20 A. Yes.</p> <p>21 Q. And that was also the -- your</p> <p>22 understanding of Bill Holcomb's opinion, based on</p> <p>23 your conversations with him, correct?</p> <p>24 A. Yes.</p> <p>25 Q. And it certainly was the opinion of</p>	<p style="text-align: right;">Page 91</p> <p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. And that was also your opinion, correct?</p> <p>4 A. Yes.</p> <p>5 Q. And based on your conversations with other</p> <p>6 members of the management or the union or officers</p> <p>7 of the union, Mr. Nevarez and Mr. Holcomb, that</p> <p>8 was also their opinion, correct?</p> <p>9 A. Yes.</p> <p>10 Q. And among other things, it's the desire of</p> <p>11 the union that Southwest Airlines not be involved</p> <p>12 in union activities at all, that the union should</p> <p>13 control those activities, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Did you assist Mr. Nevarez in any of his</p> <p>16 duties or activities on behalf of the union?</p> <p>17 A. Just we did some work --</p> <p>18 MR. GREENFIELD: Objection, form.</p> <p>19 A. -- together on it.</p> <p>20 Q. What work did you do with or for</p> <p>21 Mr. Nevarez?</p> <p>22 A. We just did some CAN leader, some</p> <p>23 mobilization efforts during our contract time.</p> <p>24 THE WITNESS: If you could excuse me</p> <p>25 one second, I need to turn the air-conditioning</p>
<p style="text-align: right;">Page 90</p> <p>1 Ms. Stone; she not only wrote this, but that was</p> <p>2 your -- also your understanding from her from your</p> <p>3 dealings with her?</p> <p>4 A. Yes.</p> <p>5 Q. And tell me other members of management of</p> <p>6 the Local 556 at that time.</p> <p>7 A. You -- those are really the only people</p> <p>8 that I'm really close -- have, have --</p> <p>9 Q. Okay.</p> <p>10 A. -- have any kind of a relationship with.</p> <p>11 Q. Okay. Let's go down to the bottom. It</p> <p>12 says, On a personal note, however, please know</p> <p>13 that the social media issues management</p> <p>14 investigated and the resulting discipline</p> <p>15 Southwest Airlines issued did not arise out of</p> <p>16 something management simply uncovered or stumbled</p> <p>17 upon. They are not generally monitoring our</p> <p>18 sites. Instead, these cases come about as our</p> <p>19 flight attendants are turning each other in.</p> <p>20 These latest investigations have been the result</p> <p>21 of flight attendant complaints. I am asking that</p> <p>22 we please consider stopping any back-and-forth</p> <p>23 fighting on social media.</p> <p>24 That was your understanding in April</p> <p>25 of 2015 as to Ms. Stone's opinion in this regard,</p>	<p style="text-align: right;">Page 92</p> <p>1 down in my room.</p> <p>2 MR. PRYOR: Sure. Anytime you need to</p> <p>3 go, let me know.</p> <p>4 THE WITNESS: Okay.</p> <p>5 Q. Okay. And I'm, I'm sorry, I didn't quite</p> <p>6 understand the work that you did with Mr. Nevarez.</p> <p>7 Do you mind repeating your answer?</p> <p>8 A. I was -- when I was on the CAN, CAN leader</p> <p>9 committee, we basically just passed out</p> <p>10 information to, to flight attendants during</p> <p>11 contract negotiation time.</p> <p>12 Q. Any other joint activities with</p> <p>13 Mr. Nevarez and yourself, where you were assisting</p> <p>14 him, that you can recall?</p> <p>15 A. Not that I can recall, no.</p> <p>16 Q. I'm going to show you what I've marked for</p> <p>17 your deposition as Trial Exhibit 21 and probably</p> <p>18 Trial Exhibit 21-E because I'm referring to</p> <p>19 specific pages within Trial Exhibit 21.</p> <p>20 And can you see this document?</p> <p>21 A. Yes.</p> <p>22 Q. And you're -- you were not on this</p> <p>23 document. This is an --</p> <p>24 A. Okay.</p> <p>25 Q. -- e-mail referring to information that</p>

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<p>1 you sent.</p> <p>2 A. That I sent?</p> <p>3 Q. Yes. And I -- I'll get to those e-mails</p> <p>4 as well. But I -- I'll ask you specific questions</p> <p>5 about people.</p> <p>6 Do you --</p> <p>7 A. Okay.</p> <p>8 Q. -- recall that you turned in -- I think</p> <p>9 you've told us yes to this -- Jeanna Jackson for,</p> <p>10 in your opinion, violating social media policy?</p> <p>11 A. Yes.</p> <p>12 Q. And was Ms. Jackson a member of the union?</p> <p>13 A. At some point she was, yes.</p> <p>14 Q. Well, she was a member of the union in</p> <p>15 January of 2017, wasn't she?</p> <p>16 A. Okay.</p> <p>17 Q. As far as you know, you were turning in a</p> <p>18 union member, correct?</p> <p>19 A. Okay.</p> <p>20 Q. Is okay an agreement with my statement?</p> <p>21 A. Yes. It --</p> <p>22 Q. And what you did to turn her and others</p> <p>23 in, is you went on to people that you thought were</p> <p>24 opposed to the current union leadership, and you</p> <p>25 went on to their social media sites and dug and</p>	<p>1 media of these individuals, you went on to chat</p> <p>2 groups, One Luv, Fusion, flight attendant chat</p> <p>3 groups, looking for information against these</p> <p>4 individuals so you could report them to Southwest</p> <p>5 Airlines because you didn't like their, in your</p> <p>6 opinion, antiunion activities?</p> <p>7 A. That -- that's, that's completely</p> <p>8 inaccurate, no.</p> <p>9 Q. What's inaccurate about that?</p> <p>10 A. To suggest that I'm scouring pages trying</p> <p>11 to dig up things, that's absolutely false. Second</p> <p>12 of all, it isn't their, their -- necessarily their</p> <p>13 objection to the, the, the current union, it's the</p> <p>14 misinformation, lies, and innuendos that they</p> <p>15 spread.</p> <p>16 Q. So you're, you're looking for -- by the</p> <p>17 way, did you report anyone, anyone that was sup --</p> <p>18 supplying any lies or misinformation that</p> <p>19 supported the current union leadership?</p> <p>20 A. Well, they probably wouldn't have been</p> <p>21 spreading lies and misinformation if they</p> <p>22 supported the current administration, would they?</p> <p>23 Q. Okay. Well, that's -- I guess that's your</p> <p>24 testimony, that no one of the current union</p> <p>25 leadership and none of their supporters ever said</p>
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<p>1 dug, looking for any potential violations of what</p> <p>2 you considered to be an interpretation of</p> <p>3 Southwest's social media policy?</p> <p>4 A. That's inaccurate.</p> <p>5 Q. Okay. Make it accurate for me.</p> <p>6 A. I -- things, things were made public,</p> <p>7 things were shared. I, I, I don't know -- I, I</p> <p>8 couldn't tell you where any particular thing came</p> <p>9 from, but to suggest actually -- I, I, I wouldn't</p> <p>10 even -- I don't think I even have access to her</p> <p>11 Facebook page.</p> <p>12 Q. To whose Face -- oh, to Ms. Jackson's?</p> <p>13 A. Jeanna Jackson, yes.</p> <p>14 Q. So you're sa -- you're saying that you</p> <p>15 went on --</p> <p>16 A. And I --</p> <p>17 Q. Go ahead.</p> <p>18 A. I'm sorry. And I don't believe that</p> <p>19 anything that I would have had access to would</p> <p>20 have come from her own personal knowledge. More</p> <p>21 than likely a flight attendant page somewhere.</p> <p>22 Q. Okay. Like Fusion or One Luv?</p> <p>23 A. Yeah, exactly.</p> <p>24 Q. Okay. So you went on to various websites</p> <p>25 then, not just necessarily the personal social</p>	<p>1 anything inaccurate, and if they had, you would</p> <p>2 have reported them, too, right?</p> <p>3 MR. GREENFIELD: Objection, form.</p> <p>4 Compound question.</p> <p>5 A. First of all, they wouldn't have -- they</p> <p>6 would not have posted inaccurate information, much</p> <p>7 like this, this other group has. So that, that</p> <p>8 would be a mute point.</p> <p>9 Q. If anyone supporting Ms. Stone had posted</p> <p>10 anything accurate, you surely would have reported</p> <p>11 them to Southwest Airlines' management as well,</p> <p>12 correct?</p> <p>13 A. Well, they probably wouldn't -- as I said</p> <p>14 before, they probably wouldn't have posted</p> <p>15 something inaccurate or lies or innuendos if they</p> <p>16 supported Ms. Stone.</p> <p>17 Q. But if they had, just take that</p> <p>18 hypothetical for me that all of these Stone</p> <p>19 supporters, not just somehow one of them said</p> <p>20 something somewhat inaccurate, you would have</p> <p>21 reported them, too, right?</p> <p>22 A. I, I don't know.</p> <p>23 Q. Really, you don't know? You weren't</p> <p>24 looking to target anything --</p> <p>25 A. It's a hyp -- it's a hyp -- it's a --</p>

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<p>1 Q. -- other than opposition -- sorry. Is</p> <p>2 that really your testimony?</p> <p>3 A. It's a hypothetical question.</p> <p>4 Q. It's not hypothetical. Are you telling me</p> <p>5 that you were trying to look at websites about</p> <p>6 this election, and you were fairly and willing to</p> <p>7 report anyone, even up to and including Audrey</p> <p>8 Stone, if you saw something inaccurate, or, or</p> <p>9 were you looking to report people that were</p> <p>10 opposed --</p> <p>11 MR. GREENFIELD: Object --</p> <p>12 Q. -- to the current union leadership?</p> <p>13 MR. GREENFIELD: Objection.</p> <p>14 A. I was looking, I was looking to report</p> <p>15 people that repeatedly spread lies and mistruths.</p> <p>16 Q. And it just so happened all of them were</p> <p>17 opponents of the leadership that you supported,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. And so Jeanna Jackson was one. She was</p> <p>21 one of the people you reported. And she was,</p> <p>22 among other things, part of the recall effort of</p> <p>23 Ms. Stone, Mr. Nevarez, Mr. Holcomb, and</p> <p>24 Mr. Parrott, true?</p> <p>25 A. Correct.</p>	<p>1 name's in this one. I'll find one with your name</p> <p>2 in it, if it helps you. Give me just a second.</p> <p>3 Okay. Let's look at 21-B. Okay. Is</p> <p>4 21-B on your screen?</p> <p>5 A. Yes.</p> <p>6 Q. It says, Deborah Edwards and I received</p> <p>7 the attached e-mails from Brian containing</p> <p>8 additional social media posts. We can review this</p> <p>9 information and determine next steps.</p> <p>10 That's part of these e-mails, and</p> <p>11 there are several more that also refer to it. Do</p> <p>12 you have any doubt that these are the people that</p> <p>13 you --</p> <p>14 A. Okay.</p> <p>15 Q. -- reported?</p> <p>16 MR. GREENFIELD: Objection, form.</p> <p>17 A. No.</p> <p>18 Q. Okay. So let me just get a answer to</p> <p>19 these questions then. And I'll combine these.</p> <p>20 Is it fair to say that you reported in</p> <p>21 February, on or around February 27, 2017 -- and I</p> <p>22 do think I have an e-mail later, if you want it,</p> <p>23 we can get the exact date, but that's the time</p> <p>24 frame -- in the time frame of February 27, 2017,</p> <p>25 you reported to Southwest Airlines management for</p>
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<p>1 Q. And you reported Beverly Belanger,</p> <p>2 correct?</p> <p>3 A. I don't know.</p> <p>4 Q. You don't recall?</p> <p>5 A. No.</p> <p>6 Q. So you don't recall if you reported</p> <p>7 Michelle Foley, Charlene Carter, Greg Hofer,</p> <p>8 correct?</p> <p>9 MR. GREENFIELD: Objection, form.</p> <p>10 A. Okay.</p> <p>11 Q. You don't recall that you reported those</p> <p>12 people, correct?</p> <p>13 A. I -- apparently I did. I don't deny that</p> <p>14 I did.</p> <p>15 Q. So would -- I -- I'm not trying to</p> <p>16 convince you. I have these documents that --</p> <p>17 A. Uh-huh.</p> <p>18 Q. -- are e-mails -- let me just finish --</p> <p>19 that say this information was received from Brian</p> <p>20 Talburt. These are from --</p> <p>21 A. Right.</p> <p>22 Q. -- people at Southwest Airlines. I can</p> <p>23 show you several more --</p> <p>24 A. Okay.</p> <p>25 Q. -- that say that. And let me see if your</p>	<p>1 what you believed to be violations of social media</p> <p>2 policy the following persons: Jeanna Jackson,</p> <p>3 Beverly Belanger, Michelle Foley, Charlene Bates,</p> <p>4 Greg Hofer, Molly Kearney, Rick Rivera, Mike</p> <p>5 Casper; would that be accurate?</p> <p>6 A. Yes.</p> <p>7 Q. And then I'm gonna go ahead -- and I</p> <p>8 stopped on these, you also reported Radar Love and</p> <p>9 Leesa Skygirl, and I assume those are not anyone's</p> <p>10 actual names, but do you know who those</p> <p>11 individuals are?</p> <p>12 A. Actually, I don't, but ...</p> <p>13 Q. Okay. You reported people, you didn't</p> <p>14 know who they were, but their posts told you that</p> <p>15 they should be reported?</p> <p>16 A. Okay.</p> <p>17 Q. Well, I'm just asking you that.</p> <p>18 A. Yes.</p> <p>19 Q. Is that your assumption?</p> <p>20 Yes?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Now, I want to go back to each of</p> <p>23 these people. And I don't know as to each of</p> <p>24 them, I'll try and ask it this way, but if we need</p> <p>25 to go through each one, that's fine as well.</p>

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<p>1 Are all of these persons who were 2 supporting at that time -- that had supported the 3 recall petition? 4 A. I, I don't know. I, I -- 5 Q. Oh, okay. Let's see, you know -- 6 A. Certainly Jean -- certainly Jeanna 7 Jackson, yes. 8 Q. Okay. And Jeanna Jackson also opposed the 9 current union leadership? 10 A. Yes. 11 Q. Okay. And Beverly Belanger, she was 12 involved in the recall or opposed to the current 13 union leadership? 14 A. I, I don't remember. To be honest with 15 you, I don't even remember who that is. 16 Q. Okay. What about Michelle Foley do you 17 recall? 18 A. The only thing I remember about Michelle 19 Foley is she was a friend of Jeanna Jackson. 20 Q. Do you believe that you were turning in 21 people that were opposed to the union and that you 22 were turning them in because they were spreading 23 misinformation about the union? 24 A. Misinformation that would have -- I'm 25 going to have to -- my, my AirPods are dying.</p>	<p>1 You are not on -- can, can you see 2 Trial Exhibit 21-A? 3 A. Yes. 4 Q. And you're not on this e-mail, but I'm 5 gonna ask you if you know anything about it. 6 It says it's from Julie O'Grady, Good 7 afternoon, and I'm gonna go to the second-to-last 8 sentence -- well, actually, let me go to the 9 first. After doing some additional research on 10 the information Brian forwarded to us on 11 Wednesday, I did not see any additional 12 information to investigate from an employee 13 relations standpoint. 14 And as a longtime employee of 15 Southwest Airlines, are you able to interpret that 16 for us? 17 A. No. 18 Q. I'm sorry? 19 A. I don't know what this is about. 20 Q. And I -- I'm having a very hard time 21 hearing you. 22 A. I don't know what that's about. 23 Q. Okay. And then it says, Deborah is 24 getting clarification from Brian to find out where 25 he got the thread we are going to discuss with</p>
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<p>1 I've gotta get a headset. Hang on just a second. 2 Q. Yeah. Do you want to take a quick break 3 or ... 4 A. Okay. Can you hear me? 5 Q. Yes. 6 A. I -- 7 Q. You have, you have your AirPods on? Can 8 you hear me? 9 A. I don't hear you. 10 Q. Yeah, I'm having a little trouble hearing 11 you. 12 A. Hang on. I, I can't, I can't hear 13 anything. 14 (Discussion off the record). 15 MR. PRYOR: Let's go off the record 16 and see if we can get that technical difficulty 17 taken care of. Thank you, Melody. 18 THE VIDEOGRAPHER: Going off the 19 record at 6:13. 20 (Recess). 21 THE VIDEOGRAPHER: We are back on the 22 record with Clip 3 at 6:16. 23 Q. Okay. I'm going to show you a couple of 24 more e-mails relating to this. One is Trial 25 Exhibit 21-A. We'll see if I can share that.</p>	<p>1 flight attendants Hofer and Rivera. 2 Do you recall having discussions with 3 anyone at Southwest Airlines management about 4 Hofer and Rivera? 5 A. No. 6 Q. You don't recall if, in fact, the charges 7 you brought against Hofer and Rivera resulted in 8 further action? 9 A. I, I haven't any idea. 10 Q. I'm sorry? 11 A. I don't -- I don't know, and I don't know 12 what the charges were. 13 Q. Okay. Well, the charges you brought were 14 violations of social media policy, right? 15 A. Well, of course, but I don't know what 16 the, the topic was. 17 Q. Okay. And then let's look at 21-C. Can 18 you see Exhibit 21-C? 19 A. Yes. 20 Q. And you're not on this e-mail, but it's 21 about the additional information in the subject 22 line it says you provided. 23 Tammy, There are more posts from 24 Brian. I think he is going through all, all his 25 archived files and digging up everything he can.</p>

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<p>1 ER is working with the bases and Brian.</p> <p>2 Did you have any conversation with</p> <p>3 anyone at Southwest Airlines that would inform</p> <p>4 that e-mail?</p> <p>5 A. I -- not that I'm aware of.</p> <p>6 Q. Okay. So at least according to Ms. Emlet,</p> <p>7 she thinks you're going through all of your</p> <p>8 archived files, digging things up, and that you</p> <p>9 are going to be working with the bases -- ER is</p> <p>10 going to be working with the bases and you; that's</p> <p>11 a fair interpretation of what we're reading here?</p> <p>12 A. How I'm reading it is they're going to</p> <p>13 seek fur -- further clarification on something</p> <p>14 that I provided them.</p> <p>15 Q. Okay. ER is employee relations?</p> <p>16 A. I believe so.</p> <p>17 Q. And bases is the management at the various</p> <p>18 bases?</p> <p>19 A. Yes.</p> <p>20 Q. And Brian is you?</p> <p>21 A. Yes.</p> <p>22 Q. And so employee relations, which is part</p> <p>23 of the management of Southwest Airlines, is gonna</p> <p>24 work with you and bases about this information</p> <p>25 that you've been providing, according to this</p>	<p>1 words?</p> <p>2 A. You're suggesting that I'm working with</p> <p>3 the company on something. I'm not. I send them</p> <p>4 something, and I'm assuming -- because I know</p> <p>5 nothing about this, but I'm assuming they're just</p> <p>6 going to, if they need to, get clarification from</p> <p>7 me.</p> <p>8 Q. Sir, I wasn't suggesting anything. I was</p> <p>9 reading exactly what the e-mail said. The only</p> <p>10 suggestion is from the e-mail.</p> <p>11 A. Okay.</p> <p>12 Q. You think I said anything contrary to what</p> <p>13 the e-mail says that led you to say you're making</p> <p>14 it sound like a grand conspiracy?</p> <p>15 A. Okay.</p> <p>16 Q. Do you have an answer?</p> <p>17 MR. MORRIS: Was there a question?</p> <p>18 MR. PRYOR: Yes.</p> <p>19 MR. MORRIS: I didn't catch it. I</p> <p>20 just caught -- there was a wind up, and I didn't</p> <p>21 catch the actual question.</p> <p>22 Q. Are you gonna answer the question, sir?</p> <p>23 A. What, what was the question?</p> <p>24 Q. The question was: Did I do -- you said</p> <p>25 you're making this sound like a grand conspiracy,</p>
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<p>1 e-mail, right?</p> <p>2 A. The way that she structured that, that</p> <p>3 statement, I don't agree with that. It's not that</p> <p>4 they're working with me per se, you're making</p> <p>5 it -- you're portraying it as some grand</p> <p>6 conspiracy, and it's not that at all.</p> <p>7 Q. Well, I --</p> <p>8 A. I'm going to, I'm going to assume that if</p> <p>9 I provided them something, they would ask for</p> <p>10 clarification.</p> <p>11 Q. Well, you know, it's interesting you call</p> <p>12 it a grand conspiracy by me simply using the</p> <p>13 actual words of the e-mail. The actual words of</p> <p>14 the e-mail to you evidence a grand conspiracy</p> <p>15 based on what you just testified to, correct?</p> <p>16 A. I, I don't agree with that, no.</p> <p>17 Q. You just said those words make it sound</p> <p>18 like a grand conspiracy.</p> <p>19 A. The way that --</p> <p>20 Q. Is that what you told us?</p> <p>21 A. The way that you're framing the words,</p> <p>22 yes.</p> <p>23 Q. I'm framing the words?</p> <p>24 A. Yes.</p> <p>25 Q. How do -- what do you mean framing the</p>	<p>1 and my question to you, when you've told me I'm</p> <p>2 making it sound like a grand conspiracy, did I do</p> <p>3 anything other than read the actual words of the</p> <p>4 e-mail?</p> <p>5 A. Yes, you read the words and read the --</p> <p>6 Q. No, did I do anything else, did I add to</p> <p>7 the words to make it --</p> <p>8 A. No.</p> <p>9 Q. -- sound like a, a conspiracy, or did I</p> <p>10 simply read the words?</p> <p>11 A. You read the words.</p> <p>12 Q. Let's look at 21-U. Can you see 21-U on</p> <p>13 your screen?</p> <p>14 A. Yes.</p> <p>15 Q. And this is an e-mail from you to Mike</p> <p>16 Sims and Sonya Lacore, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And, by the way, for this e-mail to Sonya</p> <p>19 Lacore, you used her business e-mail, correct?</p> <p>20 A. I don't know. It doesn't show the e-mail</p> <p>21 address there.</p> <p>22 Q. You, you don't know from it saying Sonya</p> <p>23 Lacore; her personal one is not different, you</p> <p>24 don't recall that?</p> <p>25 A. No.</p>

27 (Pages 105 to 108)

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<p style="text-align: right;">Page 109</p> <p>1 Q. Okay. So you -- what about Mike Sims, did 2 you send it to his business address or his home 3 address? 4 A. I, I, I don't know. It only has the name 5 there. I, I don't, I don't think I have a 6 personal address for him. 7 Q. Okay. So you, you only sent to Mike Sims' 8 business address; you may or may not send it to 9 Sonya Lacore's business address, correct? 10 A. Correct. 11 Q. And here, do you recall this e-mail, When 12 does it stop? 13 A. Yes. 14 Q. And this is you complaining very heavily 15 about Jeanna Jackson and the social media policy 16 should be utilized to terminate her -- 17 A. Yes. 18 Q. -- true? 19 A. Yes. 20 THE REPORTER: I'm, I'm sorry, Bobby, 21 I'm really having trouble hearing the witness. 22 MR. PRYOR: I know, and I am too, sir, 23 and I -- I'm sorry that, that we're having to do 24 these things by Zoom. But -- and I'm not 25 suggesting you shout, but if you can hold whatever</p>	<p style="text-align: right;">Page 111</p> <p>1 A. I, I don't -- did I? 2 Q. Did you? 3 A. I, I don't know. 4 Q. It says president at TWU 556? 5 A. Okay. I'm, I'm not seeing that here. 6 That's why I'm, I'm not, I'm not disputing that. 7 I just don't see it. 8 Q. Okay. Do you know who 9 president@twu556.org would be? 10 A. Yes. 11 Q. Who? 12 A. It would be Audrey Stone. 13 Q. Okay. So you did include Ms. Stone on 14 this e-mail where you were urging that the social 15 media policy be utilized to terminate a union 16 employee? 17 A. Okay. 18 Q. Hold on one sec. 19 Now, let's go back to -- what -- okay. 20 All right. I'm gonna show you Exhibit 27, and 21 this is an e-mail that you are on. 22 Do you see this, sir? 23 A. No, there's nothing there yet. 24 Q. Oh, sorry. Let me share screen. 25 Okay. Do you see Exhibit 27?</p>
<p style="text-align: right;">Page 110</p> <p>1 speak -- you're speaking into closer, it would be 2 very helpful. 3 (Discussion off the record). 4 Q. Okay. Let's look at Trial Exhibit 27. 5 A. Are you there? 6 THE VIDEOGRAPHER: Uh-oh. Did we lose 7 him? 8 MR. PRYOR: Mr. Talburt, are you 9 there? 10 Let's go off the record and see if we 11 can find him. 12 THE VIDEOGRAPHER: Going off the 13 record at 6:25. 14 (Recess). 15 THE VIDEOGRAPHER: We're back on the 16 record with Clip 4 at 6:27. 17 Q. Okay. Sir, I want to go back to -- that's 18 not it. Let me see if I can find what I'm looking 19 for. Okay. Here it is. 20 The exhibit we were previously talking 21 about, 21-U, which you acknowledge was an e-mail 22 you sent to Sonya Lacore to Mike Sims urging that 23 Ms. Jackson be terminated for violations of the 24 Southwest social media policy, you also carbon 25 copied Ms. Stone on that e-mail, correct?</p>	<p style="text-align: right;">Page 112</p> <p>1 A. Uh-huh. 2 Q. And at the top of this, it says from Brian 3 Talburt to Audrey Stone, October 13, 2014, 4 correct? 5 A. Yes. 6 Q. By the way, I -- before going into this 7 exhibit, let me go back and ask you about the 8 reports that you made in February of 2017 of the 9 numerous individuals that you previously 10 identified. So you understand what I'm talking 11 about now? 12 A. Yes. 13 Q. And are you aware that Audrey Stone, one 14 or two days in the same time frame that you were 15 sending those individuals who were members of the 16 union to Southwest Airlines for what you said were 17 social media policy violations, at the time you 18 were doing that, Audrey Stone made a complaint 19 against Charlene Carter. Are you aware of that? 20 A. I -- I've heard that, yes. 21 Q. Okay. So -- 22 A. But I don't know what the date was or the 23 time was. 24 Q. And did, did Ms. Stone talk to you about 25 that before she did it?</p>

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<p>1 A. No.</p> <p>2 Q. And so it was just an incredible</p> <p>3 coincidence that you sent all of these people for</p> <p>4 investigation that were opposing the union at the</p> <p>5 same time that Ms. Stone also reported Ms. Carter</p> <p>6 for social media policy violations, correct?</p> <p>7 A. I, I can't comment on that because I don't</p> <p>8 know.</p> <p>9 Q. You don't think it's a coincidence, do</p> <p>10 you?</p> <p>11 A. I, I have no idea.</p> <p>12 Q. So you don't know if it's a coincidence or</p> <p>13 not?</p> <p>14 THE REPORTER: I'm sorry, Bobby, I</p> <p>15 didn't get an answer.</p> <p>16 A. Yes, yes, I believe a coincidence.</p> <p>17 Q. I'm sorry?</p> <p>18 A. Yes, I believe it would likely be a</p> <p>19 coincidence.</p> <p>20 Q. Okay. I was going to say it had to be one</p> <p>21 or the other; you either knew or it's a</p> <p>22 coincidence, and so you're saying it's a</p> <p>23 coincidence, right?</p> <p>24 A. I, I, I have no knowledge of it, so I'm</p> <p>25 assuming it's a coincidence.</p>	<p>1 Coffee is -- who is Tina Coffee?</p> <p>2 A. She was a board member.</p> <p>3 Q. Okay. All right. And Tina is sending an</p> <p>4 e-mail to someone that says, Someone sent this to</p> <p>5 me. Sorry I sent it to your personal e-mail, but</p> <p>6 I'm, I'm on my mom's computer right now. Thought</p> <p>7 you might want to see it. Personally, when they</p> <p>8 said they were going to have the CAN team show how</p> <p>9 much we make compared to other airlines, I</p> <p>10 expected this type of conspiracy theory.</p> <p>11 Then it goes on. It's basically</p> <p>12 saying that -- disagrees with whatever this e-mail</p> <p>13 below that's written by someone that apparently is</p> <p>14 opposed to the contract. Do you recall that?</p> <p>15 A. I -- no.</p> <p>16 Q. And you can't tell that from looking at</p> <p>17 the portions of the e-mail I've shown you, true?</p> <p>18 A. I mean, I have an idea what the subject</p> <p>19 matter is. But I don't, I don't recall the</p> <p>20 e-mails. I don't know anything about these</p> <p>21 e-mails.</p> <p>22 Q. Okay. Well, let's see if some other</p> <p>23 things can remind you.</p> <p>24 And this says to Brian from Trudy and</p> <p>25 Brett Nevarez, although it says Luv, Brett. Do</p>
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<p>1 Q. Okay. Let's go back to Exhibit 27. Okay.</p> <p>2 Let's go back to Exhibit 27, and I'm showing you</p> <p>3 the top of this, and we're gonna have to go to the</p> <p>4 bottom of this e-mail string just to help your</p> <p>5 recollection. It says Re: Casper and Hofer rant.</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Do you recall this?</p> <p>9 A. No.</p> <p>10 Q. Okay. Let's go to the beginning of this.</p> <p>11 This is -- okay. See where my cursor is?</p> <p>12 A. Yes.</p> <p>13 Q. It says From: Tina, To, and it's marked</p> <p>14 out?</p> <p>15 A. Okay.</p> <p>16 Q. And this subject matter is Casper and</p> <p>17 Hofer rant.</p> <p>18 Do you know who Tina is?</p> <p>19 A. I, I -- not, not to -- not for sure. I'm</p> <p>20 -- likely Tina Coffee.</p> <p>21 Q. Tina Coffee?</p> <p>22 A. That -- that's the only Tina that I can</p> <p>23 think of.</p> <p>24 Q. Well, we can go up and see if any shows</p> <p>25 any more. I don't see that name again. But Tina</p>	<p>1 you -- that might be a joint personal e-mail</p> <p>2 address for Brett and his wife; is that correct?</p> <p>3 A. Yes, I think so.</p> <p>4 Q. And that was not sent on the union e-mail</p> <p>5 address for some reason, apparently, right?</p> <p>6 A. I, I don't know.</p> <p>7 Q. You don't know?</p> <p>8 THE REPORTER: I'm sorry, I didn't</p> <p>9 hear, I didn't hear an answer.</p> <p>10 A. I, I don't know.</p> <p>11 Q. It says, Leg breaking time for Casper the</p> <p>12 ghost scab.</p> <p>13 Do you recall earlier telling me that</p> <p>14 that was one of the nicknames that you had for</p> <p>15 Mr. Casper?</p> <p>16 A. That, that was a term comp -- that was --</p> <p>17 he was -- how he was frequently referenced, yes.</p> <p>18 Q. Okay. And apparently by other members of</p> <p>19 the leadership of Local 556, correct?</p> <p>20 A. I, I don't know. Brett would be the only</p> <p>21 person that I would -- that probably would ever</p> <p>22 have used that.</p> <p>23 Q. Okay. So at, at least one member of the</p> <p>24 leadership of Local 556 was also referring, in</p> <p>25 addition to yourself, was referring to Mr. Casper</p>

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<p>1 as the ghost scab, correct?</p> <p>2 A. Yes.</p> <p>3 Q. A scab is a very derogatory term to use</p> <p>4 regarding a union member, correct?</p> <p>5 A. I don't know that it's necessarily</p> <p>6 derogatory. It's a term that -- to reference</p> <p>7 somebody that, that does not -- that -- the</p> <p>8 conventional wisdom has crossed the picket line,</p> <p>9 but in our particular case, I'm, I'm assuming it's</p> <p>10 somebody that opposed our union.</p> <p>11 Q. So you're telling us that the use of the</p> <p>12 term "scab" is not derogatory, right?</p> <p>13 A. I, I think it's a pretty common term.</p> <p>14 Q. I didn't ask you if it was a common term.</p> <p>15 Will you answer my question?</p> <p>16 A. Is it derogatory, I don't, I don't --</p> <p>17 it's, it's what -- it's just a common term to, to</p> <p>18 describe a person like that.</p> <p>19 Q. And it's not derogatory, correct?</p> <p>20 A. It's what they are.</p> <p>21 Q. I -- once again, sir, I'd like you to</p> <p>22 answer my question.</p> <p>23 A. Okay.</p> <p>24 Q. And by the way, what, what, what picket</p> <p>25 line did Mr. Casper cross?</p>	<p>1 argumentative.</p> <p>2 Q. You can answer.</p> <p>3 A. What's the question?</p> <p>4 Q. The question is: You have changed your</p> <p>5 definition of scab, before you told us it meant</p> <p>6 someone crossing a picket line, what I've always</p> <p>7 heard it meant, but, in fact, now you're telling</p> <p>8 us what it means is someone that's opposed to the</p> <p>9 union.</p> <p>10 A. Okay.</p> <p>11 Q. Correct?</p> <p>12 A. Correct.</p> <p>13 Q. So Jeanna Jackson is a scab, in your</p> <p>14 opinion?</p> <p>15 A. You said that.</p> <p>16 Q. I asked your opinion. You said anyone</p> <p>17 opposed to the union. You considered her --</p> <p>18 anyone you think is opposed to the union is a</p> <p>19 scab, and apparently this Mr. Nevarez by the way,</p> <p>20 he knew that Mike Casper had never crossed a</p> <p>21 picket line, he's using the word scab, right?</p> <p>22 MR. GREENFIELD: Objection, form.</p> <p>23 A. I, I can't speak for what Brett thought or</p> <p>24 what his intentions were.</p> <p>25 Q. Okay. You can speak to Mr. Nevarez</p>
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<p>1 A. Well, that, that -- no, no picket line.</p> <p>2 Q. Okay. You just swore under oath what scab</p> <p>3 meant. You then said it described exactly what he</p> <p>4 was, and, in fact, he never did?</p> <p>5 A. Okay.</p> <p>6 Q. You don't have a problem not telling the</p> <p>7 truth, do you?</p> <p>8 A. That's --</p> <p>9 Q. You just swore to that.</p> <p>10 MR. GREENFIELD: Objection, form.</p> <p>11 Q. You said he was a scab, and you said it's</p> <p>12 not derogatory; is that still your testimony?</p> <p>13 A. It's a term to use des -- to describe</p> <p>14 somebody that basically abandons their union.</p> <p>15 That's the conte -- context of what it's being</p> <p>16 used as.</p> <p>17 Q. So now you've changed your definition of</p> <p>18 scab. So you've changed your definition of scab,</p> <p>19 you said he was a scab, then you said he wasn't,</p> <p>20 now you're telling us that scab doesn't mean</p> <p>21 crossed picket lines, it means just opposed to the</p> <p>22 union, right? That's now what that means,</p> <p>23 correct?</p> <p>24 MR. GREENFIELD: Objection, form,</p> <p>25 mischaracterizes testimony. And it's</p>	<p>1 saying, Leg breaking time for Casper the ghost</p> <p>2 scab. That's what he wrote to you, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Did you turn him in for a violation of</p> <p>5 Southwest policy for that?</p> <p>6 A. I did not.</p> <p>7 Q. Why not?</p> <p>8 A. Well, I don't really see a violation of a</p> <p>9 social media policy, that's, again, a metaphor.</p> <p>10 Leg breaking time, clearly he did not mean he was</p> <p>11 going to go break Mike Casper's leg. He's, he's</p> <p>12 referencing old time union mentality.</p> <p>13 Q. Where in my question did I say it violated</p> <p>14 social media policy at Southwest?</p> <p>15 A. You asked me if I turned it in.</p> <p>16 Q. I did; did you turn him in for a violation</p> <p>17 of any Southwest policies. I didn't limit it to</p> <p>18 social media.</p> <p>19 A. I'm sorry. No, I did not.</p> <p>20 Q. And then someone responded, He is such an</p> <p>21 ass.</p> <p>22 Who is that response from?</p> <p>23 A. I don't know.</p> <p>24 Q. You don't know who Rocky Mountain is?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 121</p> <p>1 Q. Although Rocky Mountain sent it to you, 2 correct? 3 A. It would appear so, yes. 4 Q. And when he said, He is such an ass, do 5 you know who he's referring to? 6 A. Well, if it's, if it's replying to the 7 comment below, I'm assuming he means Casper. 8 Q. Okay. I just wanted to make sure you 9 didn't think he meant Mr. Nevarez. You, you -- 10 A. No. 11 Q. -- think it's referring to Mr. Casper. 12 Yes? 13 A. That's -- I -- that's how I would 14 interpret it. 15 Q. Okay. Then, you then include Audrey Stone 16 in this communication in which Mr. Casper's being 17 referred to as an ass and a ghost scab, correct? 18 A. Okay. 19 Q. Is that a yes? 20 A. Yes. 21 Q. And you say, A couple of things about this 22 thread. Please delete Brett's comment about leg 23 breaking. 24 Is that what you said? 25 A. Yes.</p>	<p style="text-align: right;">Page 123</p> <p>1 in management at Southwest that you had a 2 long-term relationship with. 3 A. That would on -- Mike Hafner would be the 4 only one that that would be. 5 Q. Okay. So if, if someone reading this 6 e-mail thinks, hey, you're disclosing things about 7 your conversations with Mr. Hafner and don't want 8 to get back to him, they think that's a member of 9 Southwest management, the only one it could be is 10 Mr. Hafner, correct? 11 A. Yes. 12 MR. GREENFIELD: Objection, form. 13 Q. And Mr. Hafner at that time was senior 14 management, the head of inflight, right? 15 A. In 2014, yes. 16 Q. Then you say, He is a great person that I 17 believe. With all that said, at the end of the 18 day, we are talking about my job and my life, my 19 family. I cannot hold back anything that may be 20 deemed necessary. 21 What are you talking about there? 22 A. I haven't any idea. 23 Q. Ah, so you don't recall that it's 24 something so important it involved your job, your 25 life, and your family?</p>
<p style="text-align: right;">Page 122</p> <p>1 Q. Why are you wanting to delete that? 2 A. To be honest, I don't know. I don't know 3 where, where, where I was going with that. 4 Q. So you don't know why you would send this 5 to the president of the union and then tell her to 6 be sure and delete the leg breaking comment, 7 correct? 8 A. Yes. 9 Q. And then it says, Also this was a private 10 e-mail between Mike and I. 11 Who's Mike? 12 A. I don't know. 13 Q. I take this step very seriously and would 14 hate to breach a confidence he obviously had in me 15 based on the long-term relationship we've 16 developed. 17 You're talking about a Mike and member 18 of management at Southwest Airlines, correct? 19 A. I -- to be honest, I don't know. 20 Q. Well, if you look further down, don't you 21 refer to exactly that? Is that -- you're, you're 22 saying you don't recall who Mike is. Tell us the 23 name of anyone in Southwest management that you 24 had a -- let's see how you describe it -- a, a 25 long-term relationship with. Name all the Mikes</p>	<p style="text-align: right;">Page 124</p> <p>1 A. I'm, I'm assuming I'm talking about the 2 company. 3 Q. Okay. What do you mean then? 4 A. As I've alluded to before, the amount of 5 misinformation that was being spewed on social 6 media by certain parties. 7 Q. Then you say -- I'm trying to help you. 8 You see my cursor? 9 A. Yes. 10 Q. Okay. It says, This is just an 11 illustration of the types of conversations I had 12 with senior Southwest management re dealing with 13 problem people, and in this case specifically 14 Hofer and Casper. 15 That's what you wrote, right? 16 A. Yes. 17 Q. And so you've been talking to senior 18 management about targeting people, such as 19 specifically Hofer and Casper, using social media, 20 right? 21 A. I'm sorry, targeting, targeting them on 22 social media -- 23 Q. Okay. Well, you can take away the word 24 "targeted," but you're talking about dealing -- 25 let's see what word you used, problem -- dealing</p>

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<p>1 with problem people. You were talking with senior 2 members of management at Southwest Airlines about 3 dealing with people such as Hofer and Casper by 4 use of social media policy, correct? 5 A. Yes. 6 Q. And that would include Mr. Hafner, 7 correct? 8 A. Yes. 9 Q. That would include Ms. Lacore, correct? 10 A. Yes. 11 Q. That would include Naomi Hudson, correct? 12 A. Yes. 13 Q. And did any of those people report you for 14 any violation of any Southwest policy as a result 15 of those communications? 16 A. I don't know. Not to my knowledge. 17 MR. GREENFIELD: Bobby, if I may 18 step -- this is Adam Greenfield speaking. If I 19 may step in for a moment. 20 MR. PRYOR: Yes. 21 MR. GREENFIELD: I don't want to break 22 up your flow, but you seemed like you were at a 23 pause for a moment. 24 MR. PRYOR: I am. 25 MR. GREENFIELD: Ed, Ed Cloutman is</p>	<p>1 A. No, that's not it at all. 2 Q. And when it says, Rocky Mountain e-mail is 3 Mike's personal e-mail, does that now tell you who 4 Rocky Mountain is? 5 A. Yes. 6 Q. That's Mike Hafner, correct? 7 A. Yes. 8 Q. And Mike Hafner is the one that wrote, He 9 is such an ass, referring to Casper the ghost 10 scab, correct? 11 A. Yes. 12 Q. Let me show you Trial Exhibit 29. And the 13 front cover in the center of that picture is 14 Ms. Stone, correct? 15 A. Yes. 16 Q. Okay. Who are the other people, if, if 17 you know? 18 A. From left to right, Tyler Thompson -- 19 Q. Oh, wait. Right here is Mr. Thompson? 20 A. Yes. 21 Q. Okay. And who is this? 22 A. John Parrott. Sam Wilkins, Crystal Reven, 23 Todd Gage, Brett Nevarez. 24 Q. And then are you able to see these posts 25 here?</p>
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<p>1 going to step in for me for a second. Due to 2 family medical reasons, I need to step away and 3 help my wife with bedtime with my children, so I 4 apologize. I will be back as soon as I can, but 5 Ed will take over in the meantime. 6 At this time I would like to also 7 renew my objection and, and move to strike any 8 testimony at this point. But please go ahead. 9 MR. CLOUTMAN: I'm here. Go ahead. 10 MR. PRYOR: And that's, that's fine 11 for Ed obviously to come on. 12 (Mr. Greenfield exits). 13 Q. Let's see if there was anything else in 14 Exhibit 27. I want to go to a, a sentence here 15 towards the end of your e-mail. And I'm moving my 16 cursor around. Can you see that, Mr. Talburt? 17 A. Yes. 18 Q. And it says, So what I'm saying is if we 19 have to use this type of evidence to secure my 20 job, then we have to do what we have to do. 21 Are you referring to that if you have 22 to reveal that Southwest management has been 23 involved in targeting opponents of the current 24 union management, that you'll do it if you have to 25 in order to save your job?</p>	<p>1 A. Yes. 2 Q. And it says, Click is getting agitated. I 3 think he may private message his way into big 4 troubles for himself. 5 And then two posts down, you say, We 6 can only hope. 7 And then someone says, Go to Click's 8 screenshots and save them, or screenshot his 9 posts. 10 Do you recall this? 11 A. I, I, I don't recall it, but obviously it 12 happened. 13 Q. And is this another effort to use social 14 media to target a union member that didn't agree 15 with current membership or current leadership? 16 A. It would appear so. 17 Q. When you say "it would appear so," is that 18 a yes? 19 A. It means it appears so. I have no 20 recollection of it, but it's on the screen and the 21 names are there, so I'm assuming it's accurate. 22 Q. Okay. You're not denying that you wrote 23 that and that that's the way you recall that and 24 that's the import of what you're reading? 25 A. Yes.</p>

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<p>1 Q. Go to Trial Exhibit 20 -- sorry, we just 2 did that one. 3 Let me go to 60 -- Trial Exhibit 68. 4 This is a document authored by Audrey Stone to 5 Suzanne, Suzanne Stephensen, Naomi Hudson, Sonya 6 Lacore. Have you ever seen this document before? 7 Take your time with it, if you want. I can tell 8 you that it's the e-mail in which Ms. Stone 9 complained of Ms. Carter. 10 A. No, I've never seen it. 11 Q. Okay. You can see, however, that on this 12 e-mail it's sent to Naomi Hudson, correct? 13 A. Yes. 14 Q. And that's one of the people that you've 15 identified that you were talking with senior 16 management at Southwest Airlines about using the 17 social media policy to deal with problem 18 employees, correct? I've used the exact language 19 I asked you before, sir. Are you gonna change it 20 or are you gonna agree? 21 A. I guess I'll agree. 22 Q. Okay. And then the same question as to 23 Sonya Lacore, correct? 24 A. Yes. 25 MR. PRYOR: Stop sharing. I'm going</p>	<p>1 Q. Okay. Here's an e-mail marked February 2 22nd, it says from Brian to Julie O'Grady and 3 Deborah Edwards. 4 Do you see that? 5 A. Yes. 6 Q. And you recall those as being the people 7 on the e-mails internally that you weren't on that 8 were discussing the information you sent? 9 A. I, I don't recall, but, yes. 10 Q. Oh, okay. But let's -- let me show you 11 what's attached to it. You can see it's Greg 12 Hofer -- 13 A. Uh-huh. 14 Q. -- Jeanna Jackson? 15 A. Uh-huh. 16 Q. I'm gonna, I'm gonna scroll through this, 17 and if you would just look at it and -- 18 A. Yeah, I'm -- 19 Q. -- is this -- 20 A. I remember this. 21 Q. You believe, you believe this is the 22 information, or at least part of the information 23 you sent to Ms. O'Grady? 24 A. Yes. 25 Q. Okay. So this, this document with its</p>
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<p>1 take a five-minute break, sir, if that's okay with 2 you. 3 THE WITNESS: Okay. Do we have a -- 4 do you have a -- an estimate on how long this is 5 gonna be? 6 MR. PRYOR: You know, I -- I'm looking 7 here, and I hate giving estimates, but I want to 8 hopefully be done in another hour. You can't hold 9 me to that, but on the other hand, maybe if it's 10 shorter, you can't hold me to that either. 11 THE WITNESS: Well -- 12 THE VIDEOGRAPHER: Going off the 13 record at 6:51. 14 (Recess). 15 THE VIDEOGRAPHER: We are back on the 16 record with Clip 5 at 6:58. 17 Q. Okay. That's not it. Not it. Let me get 18 the document I'm looking for. Ah, here we go. 19 Share screen. Okay. Okay. 20 Mr. Talburt, you might recall I told you earlier 21 that I did have copies of the e-mail where you 22 actually forwarded information about the union 23 opponents that you were reporting. 24 Do you recall that? 25 A. Yes.</p>	<p>1 attachments, I'm gonna just go right through it. 2 I know you can't see all this, but I just want to 3 make sure there's nothing at the end that -- okay. 4 You, you believe that on February 22nd, 2017 this 5 is part of the information you sent to Southwest 6 Airlines complaining about the union opponents 7 that you thought were sending misinformation? 8 A. That -- yes, that -- this was, this was 9 more than that, however. 10 Q. Okay. What, what more was it? 11 A. This was basically harassing somebody that 12 had a, a known disability. He had a -- he very 13 openly disclosed a medical condition he had of 14 severe depression that involved shock treatments, 15 and he did that as a public service announcement 16 to people to basically let them know about the 17 treatment and the condition and basically to help 18 other people, and, in turn, they took that 19 information and clowned him, calling him Kookie 20 and, and I don't remember what else was in there, 21 but it was, it was, it was an awful threat for 22 somebody that -- 23 Q. And -- 24 A. -- did not, that did not deserve it. 25 Q. And --</p>

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<p>1 A. And that's --</p> <p>2 Q. And that's not the only thing in these</p> <p>3 complaints, though, is it?</p> <p>4 A. I --</p> <p>5 Q. That I -- it looks like -- you're saying</p> <p>6 that's all this is?</p> <p>7 A. Well, this is -- I mean, I, I say that,</p> <p>8 right now, in fact, here we're calling him Kookie,</p> <p>9 Koochie is even crazier, and, again, he's --</p> <p>10 his --</p> <p>11 Q. So where it says, Supposedly there is a</p> <p>12 scab list circulating with 70 names on it, anyone</p> <p>13 seen it, that's about Kookie?</p> <p>14 A. No.</p> <p>15 Q. So these -- all these -- so someone can</p> <p>16 read the posts and see whether or not they're</p> <p>17 about Kookie or whether or not it's something to</p> <p>18 do with scab lists, for instance?</p> <p>19 A. Okay.</p> <p>20 Q. Correct?</p> <p>21 A. Yes. Apparently that's there as well.</p> <p>22 Q. Okay. All right. Let's see. Trial</p> <p>23 Exhibit 70?</p> <p>24 A. So let, let me, let me clarify something.</p> <p>25 Q. Sure.</p>	<p>1 Q. Are you able to tell what --</p> <p>2 A. No, I have, I have no idea.</p> <p>3 Q. Okay. So you're not denying -- it says</p> <p>4 Jeanna Jackson, She's full of hot air, that's a</p> <p>5 post from Jeanna Jackson based on this document,</p> <p>6 true?</p> <p>7 A. Yeah, I, I don't know. I, I don't know</p> <p>8 what this is about. You have to understand --</p> <p>9 Q. Okay.</p> <p>10 A. -- there, there were hundreds of these</p> <p>11 things.</p> <p>12 Q. So if you -- one of the things you can</p> <p>13 identify Exhibit 70 as, is a document that you</p> <p>14 sent to management at Southwest Airlines, and you</p> <p>15 sent these attachments --</p> <p>16 A. Okay.</p> <p>17 Q. -- correct?</p> <p>18 A. Yes.</p> <p>19 Q. Yes?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. All right. Let's make sure I've</p> <p>22 got them all then.</p> <p>23 Here's another one, February 22nd,</p> <p>24 2017. By the way, that's the same day that Audrey</p> <p>25 Stone made her complaint against Ms. Carter, the</p>
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<p>1 A. If, if I sent that post in, it would</p> <p>2 strictly be because of the part about Kookie and</p> <p>3 Koochie and, and how they were clowning him. That</p> <p>4 would have been the purpose of that, that thread</p> <p>5 being sent in.</p> <p>6 Q. So this is an e-mail from you to wnstew79.</p> <p>7 Do you know who that is?</p> <p>8 A. No.</p> <p>9 Q. Chris, Sam, the reason I am forwarding is</p> <p>10 to illustrate their strategy of bullying and</p> <p>11 creating a hostile work environment.</p> <p>12 And that's you writing to Chris?</p> <p>13 A. Chris. Sam, the reason I -- I don't -- I,</p> <p>14 I don't know.</p> <p>15 Q. Okay. And then on February 22nd, you're</p> <p>16 sending an e-mail to Ms. O'Grady and Ms. Edwards</p> <p>17 again, I'm looking through my files and forwarding</p> <p>18 you any threads I have that come from the page we</p> <p>19 discussed about the same time frame.</p> <p>20 And do you know what that's about?</p> <p>21 A. No.</p> <p>22 Q. And if you look at the attachments, and</p> <p>23 I'll go slowly and scroll through it for you; if</p> <p>24 I'm going too fast, let me know.</p> <p>25 A. No.</p>	<p>1 very day, do you recall from when we looked at</p> <p>2 that?</p> <p>3 A. Yes.</p> <p>4 Q. And so -- and that's just a coincidence as</p> <p>5 well, right?</p> <p>6 A. I, I, I don't know anything about it. I</p> <p>7 don't know.</p> <p>8 Q. Okay. The Trial Exhibit 71, you, again,</p> <p>9 are forwarding various posts on social media</p> <p>10 against the individuals -- involving the</p> <p>11 individuals that you turned in that you thought</p> <p>12 were violating Southwest Airlines social media</p> <p>13 policy, correct?</p> <p>14 A. Okay.</p> <p>15 Q. Yes?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And Exhibit 72 is more of the same,</p> <p>18 again, on February 22nd, 2017, and I'll scroll</p> <p>19 through so you can see it. Is my statement</p> <p>20 correct?</p> <p>21 A. Okay. I don't have any recollection of</p> <p>22 it, but apparently so.</p> <p>23 Q. Okay. You don't dispute that this was</p> <p>24 from you and that you sent it to Southwest</p> <p>25 Airlines management and that it had these posts to</p>

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<p>1 it? It's consistent, certainly, with your 2 recollection that you were turning in people that 3 you thought were spreading misinformation, 4 correct? 5 A. Yes. 6 Q. All right. So you, you believe that you 7 sent Exhibit 72, even though you don't recall all 8 the specifics right now? 9 A. Yes. 10 Q. Okay. That's -- I think that covers the 11 ones that you did. 12 Okay. I'm gonna have you identify a 13 few more documents, and then we'll try and wrap 14 this up for you. Let me find -- hold on. I don't 15 think I have any more questions about these 16 documents, I just want to make sure you identify 17 them. 18 Okay. This is Exhibit 21-M, and this 19 is Brian to Mike Sims. Here's the latest attempt. 20 Having surrogates contact people to send this 21 e-mail to on her behalf. Funny I didn't realize 22 how much she loved Thom. 23 And then you go on: But some -- But 24 sweet how wonderful everything was and how 25 wonderful our corrupt union was before Audrey.</p>	<p>1 Q. Okay. And then you attach what you're 2 referring to in the e-mail, correct? 3 A. Yes. 4 Q. Okay. Just a few more. One, two -- about 5 five more. 6 Okay. This is to Brian from Deborah, 7 and below that is the e-mail that we just talked 8 about, and this one is from Deborah to you saying, 9 Thank you for sending these to us, Brian. 10 Wow, it's very difficult to interpret 11 the rest, but she acknowledges that you sent the 12 information, correct? 13 A. Yes. 14 Q. And you're -- you may not remember this 15 specifically, but you're not denying that this was 16 the e-mail that you received from her, correct? 17 A. I am not denying it, no. 18 Q. You think it is, right; you have no reason 19 to dispute it? 20 A. Correct. 21 Q. Okay. Let's look at 21-R. Okay. This is 22 a much longer e-mail. And I'm not going to go 23 through it with you, but what I would like you to 24 do, and you're welcome to read it, but the -- I'd 25 like you to tell me -- can you identify this as an</p>
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<p>1 This is a communication in which you 2 sent this e-mail to Mike Sims regarding Jeanna 3 Jackson and the e-mail below, correct? 4 A. Yes. 5 Q. And let's look at Exhibit 21-P. This is 6 from you, and I'm not sure who all it's to, but 7 certainly it's -- it includes Audrey Stone. Do 8 you -- Recall being careful. Julie, As a 9 follow-up to our conversation yesterday, I am 10 including the following recent posts. A further 11 example of the public encouragement and 12 endorsement of retaliatory practices of Jeanna 13 Jackson and company. 14 So this is February 23rd, 2017, one 15 day after Ms. Stone made her complaint against 16 Ms. Carter, you're sending this to Julie at 17 Southwest Airlines management, correct? 18 A. I sent that e-mail on that date, yes. 19 Q. And you sent it to Julie, correct? 20 A. Yes. 21 Q. I know it's blacked out, but it's clearly 22 talking about Julie O'Grady? 23 A. Okay. 24 Q. You think so, too? 25 A. Yes.</p>	<p>1 e-mail, just like we did before, that you sent to 2 Julie on February 26th, 2017 and carbon copied 3 Audrey Stone? And I will go just as slow as you 4 want me to. Do you agree with that statement? 5 A. Yes. 6 Q. Let's go to -- I just have one more, I 7 have T, 21-T, and, again, is this an e-mail that 8 you sent on March 1, 2017, and included Audrey 9 Stone on, and it just says Folks, so I, I can't 10 represent to you who it went to, unless you can 11 recall. But you agree that you did send this 12 e-mail to Ms. Stone? And if you recall who else, 13 please tell us. 14 A. Yes. 15 Q. And do you recall who Folks are? 16 A. No. 17 Q. Okay. Let's look at 21-U. And that's the 18 e-mail May 15th from you to it looks like Mike -- 19 well, you tell me, is that Mike Sims or is that 20 Mike Hafner? 21 A. Mike Sims. 22 Q. Okay. Did you send this e-mail marked 23 Trial Exhibit 21-U to Mr. Sims and then received 24 the Thank you, Brian response from Mr. Sims? 25 A. Yes.</p>

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<p>1 Q. And he says, e will, presumably that's we</p> <p>2 will review your concerns.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And did they have further -- did he have</p> <p>6 further conversations with you about that, that</p> <p>7 you recall?</p> <p>8 A. No.</p> <p>9 Q. You're not saying they didn't happen,</p> <p>10 you're just saying you don't recall, correct?</p> <p>11 A. I don't believe they happened.</p> <p>12 Q. Okay. And let's identify 21-V. And this</p> <p>13 is an e-mail that you sent on July 2nd, 2017, to</p> <p>14 Mike and Julie and carbon copied Audrey Stone,</p> <p>15 correct? Correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And then this is the last one. And</p> <p>18 by the way, Mike is Mike Sims and Julie is Julie</p> <p>19 O'Grady?</p> <p>20 A. Yes.</p> <p>21 Q. And I could be wrong, but I think this is</p> <p>22 the last one. Trial Exhibit 21-W, this is an</p> <p>23 e-mail string from you to Audrey Stone, that</p> <p>24 includes the e-mails below, and you say, Why in</p> <p>25 the hell did I not find the targeted assassination</p>	<p>1 union employees that you've turned in and the</p> <p>2 information that you have, did you have any</p> <p>3 conversations with her about that?</p> <p>4 A. No, never.</p> <p>5 Q. And you told us that she would be opposed</p> <p>6 to that. Did you see any e-mails from her saying</p> <p>7 she was opposed to that?</p> <p>8 A. No, but I just -- just from, just from</p> <p>9 knowing her.</p> <p>10 Q. If, if someone included you on a half a</p> <p>11 dozen e-mails doing something I thought was wrong,</p> <p>12 and I'm leader of the local union, I'd say</p> <p>13 something. But that's not the way Ms. Stone does</p> <p>14 things?</p> <p>15 A. I don't know.</p> <p>16 Q. You know for sure that she never told you</p> <p>17 don't do that, you know for sure she never sent</p> <p>18 you an e-mail saying don't do that, correct?</p> <p>19 A. Oh, Audrey, Audrey often told me to, to</p> <p>20 not engage in social media.</p> <p>21 Q. Well, that wasn't my question. I'm</p> <p>22 talking about the e-mails that you carbon copied</p> <p>23 her on, where you were including her on your</p> <p>24 communications with Southwest management about</p> <p>25 union members that you had turned in that you</p>
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<p>1 comments three years ago when would have been</p> <p>2 useful?</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Do you recall what you're talking about?</p> <p>6 A. I'm assuming somebody used that -- I, I,</p> <p>7 I, I don't know. I can only --</p> <p>8 Q. Okay.</p> <p>9 A. -- speculate. I don't know.</p> <p>10 Q. All right. You can identify 21-W as an</p> <p>11 e-mail that, that you sent to Ms. Stone?</p> <p>12 A. Yes.</p> <p>13 Q. Now --</p> <p>14 A. I'm assuming it -- it's referencing on one</p> <p>15 of my termination cases where I was looking for</p> <p>16 evidence of similar behavior.</p> <p>17 Q. Yeah, I -- were you referring to, when you</p> <p>18 used targeted assassinations in your communication</p> <p>19 with Ms. Lacore, there were no consequences?</p> <p>20 A. No.</p> <p>21 Q. The wish you had found that?</p> <p>22 A. No, the public execution comment.</p> <p>23 Q. Oh, the -- okay. The -- these e-mails</p> <p>24 where you are including Ms. Stone on the</p> <p>25 communications where you're talking about the</p>	<p>1 thought were opponents spreading misinformation.</p> <p>2 A. And the question again?</p> <p>3 Q. She never said anything to you about don't</p> <p>4 do that, or send you an e-mail saying don't do</p> <p>5 that, correct?</p> <p>6 A. I'm sure at some point she would have told</p> <p>7 me, and I, I, I don't have any recollection of the</p> <p>8 exact time, but I'm sure she's told me on more</p> <p>9 than one occasion to not engage in management.</p> <p>10 Q. Well, in this situation she didn't, did</p> <p>11 she?</p> <p>12 A. Not -- well, not that I've seen.</p> <p>13 Q. Did you have conversations with Brett</p> <p>14 Nevarez about these people you were turning in to</p> <p>15 Southwest Airlines?</p> <p>16 A. More than likely.</p> <p>17 Q. And was he supportive of your efforts or</p> <p>18 did he tell you to stop?</p> <p>19 A. He, he would not be supportive of my</p> <p>20 efforts, no.</p> <p>21 Q. And he told you he was not; is that your</p> <p>22 testimony?</p> <p>23 A. Yes.</p> <p>24 Q. And what did you do in response to that?</p> <p>25 A. Nothing.</p>

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<p>1 Q. You continued doing what you were doing?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. You were a core team member, and</p> <p>4 I'm just gonna ask you if you agree that you made</p> <p>5 these comments on the core team -- what would you</p> <p>6 call it, Facebook group, does that identify it for</p> <p>7 you?</p> <p>8 A. Yes.</p> <p>9 Q. You used the term "haters"?</p> <p>10 A. Yes.</p> <p>11 Q. You at one point said, Is the old bag his</p> <p>12 mother?</p> <p>13 A. I don't, I don't recall that.</p> <p>14 Q. Did you say, Win for my fucktard project?</p> <p>15 A. Yes.</p> <p>16 Q. Did you say, spewing bullshit and it's</p> <p>17 acceptable collateral damage?</p> <p>18 A. I don't recall if I said that.</p> <p>19 Q. The haters are misinformed and ignorant?</p> <p>20 A. Likely.</p> <p>21 Q. Go the fuck away?</p> <p>22 A. Do what?</p> <p>23 Q. One of your comments was go the fuck away?</p> <p>24 A. Okay.</p> <p>25 Q. Are you agreeing or disagreeing with that?</p>	<p>1 A. Yes.</p> <p>2 Q. And you were reinstated this time because</p> <p>3 a union representative was not present?</p> <p>4 A. I'm sorry?</p> <p>5 Q. Why were you reinstated the second time</p> <p>6 after being terminated?</p> <p>7 A. I, I -- presumably because I shouldn't</p> <p>8 have been terminated to begin with because the</p> <p>9 charges were absolutely preposterous.</p> <p>10 Q. That's your understanding, that they then</p> <p>11 -- they just changed their mind after terminating</p> <p>12 you?</p> <p>13 A. I, I, I don't know. I wasn't privy to</p> <p>14 that. All I was privy to is the settlement.</p> <p>15 Q. Okay. And I know you told me who</p> <p>16 represented you the first time, and if you did for</p> <p>17 the second, I'm sorry. Who represented you on</p> <p>18 behalf of the union the second time?</p> <p>19 A. Brett Nevarez.</p> <p>20 Q. Sir, do you plan on appearing as a witness</p> <p>21 at trial in this matter?</p> <p>22 A. Am I?</p> <p>23 Q. Yes.</p> <p>24 A. No, no, I do not.</p> <p>25 Q. And if I asked you to appear at trial and</p>
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<p>1 A. Likely.</p> <p>2 Q. Okay. Now, your first termination, when</p> <p>3 you went to -- it -- was the first termination</p> <p>4 was, was it fucktard?</p> <p>5 A. Public execution.</p> <p>6 Q. Okay. Public execution. Oh, we read</p> <p>7 that. Okay. The public execution. And when you</p> <p>8 went to Step 2, that was changed to a 30-day</p> <p>9 suspension, correct?</p> <p>10 A. Yes.</p> <p>11 Q. And then your second encounter with the</p> <p>12 social media policy personally, that was for the</p> <p>13 fucktard?</p> <p>14 A. Yes, although I still dispute that, the</p> <p>15 fact that it was social media, but that's what</p> <p>16 they contended.</p> <p>17 Q. Okay. I, I -- I'm not --</p> <p>18 A. Okay.</p> <p>19 Q. -- taking a position on that. That --</p> <p>20 that's -- that was Southwest's position, right?</p> <p>21 A. Yes.</p> <p>22 Q. And you were terminated again, correct?</p> <p>23 A. Yes.</p> <p>24 Q. And, yet again, you were reinstated,</p> <p>25 correct?</p>	<p>1 testify personally to the jury in this matter, you</p> <p>2 would say no?</p> <p>3 A. Yes.</p> <p>4 Q. And if Southwest Airlines asked you, would</p> <p>5 your answer be any different?</p> <p>6 A. No.</p> <p>7 Q. And if the union asked you, would your</p> <p>8 answer be any different?</p> <p>9 A. No.</p> <p>10 MR. PRYOR: Thank you for responding</p> <p>11 to my questions.</p> <p>12 I pass the witness.</p> <p>13 MR. MORRIS: Ed, do you want to go</p> <p>14 ahead?</p> <p>15 MR. CLOUTMAN: I have a few, if you</p> <p>16 don't mind.</p> <p>17 MR. MORRIS: Go ahead.</p> <p>18 EXAMINATION</p> <p>19 BY MR. CLOUTMAN:</p> <p>20 Q. Mr. Talburt, this is Ed Cloutman. We've</p> <p>21 at least talked on the phone. I'm not sure we've</p> <p>22 ever met. Do you know who I am and who I</p> <p>23 represent?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Okay. Firstly, are you now holding any</p>

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<p>1 office with the executive board or a principal 2 officer of TWU Local 556? 3 A. No. 4 Q. Have you ever held such a position? 5 A. No. 6 Q. Have you, have you represented yourself to 7 speak on behalf of TWU Local 556 as its officer or 8 representative to any third party? 9 A. Never. 10 MR. CLOUTMAN: Thank you. I have no 11 other questions. 12 MR. MORRIS: I, I just have a couple 13 of questions. 14 EXAMINATION 15 BY MR. MORRIS: 16 Q. I represent Southwest. You had referenced 17 earlier about your -- the first termination, that 18 it was changed to a 30-day suspension, and in the 19 course of that discussion, you said -- you 20 referred to a settlement agreement. Did I hear 21 that correctly? 22 A. Yes. 23 Q. And what is that referring to? 24 A. Well, I, I basically was faced with a 25 choice. I felt that, I felt that it was an unjust</p>	<p>1 Q. Let me see if I can show you that 2 agreement. Am I sharing the screen? 3 A. Yes. 4 Q. Okay. Is this document a document that is 5 your reinstatement agreement on April 15 of 2015 6 with Southwest Airlines? I'll scroll down to the 7 bottom, and see your signature there. Is that it? 8 A. Yeah, scroll back to the first page. 9 Q. Okay. 10 A. Yes. 11 Q. Okay. And I'm gonna refer to this as -- I 12 have no idea what -- how we're able to do this 13 right now, but I'll refer to this as to the 14 Southwest April 15, 2015 agreement. And that's 15 the exhibit I'm currently referring to. We'll 16 obviously make it available to counsel and the 17 court reporter. 18 And if you go through this agreement, 19 there's nothing in this agreement that says this 20 is your last chance, correct? 21 A. I mean, I think that's -- one would assume 22 that, but -- 23 Q. You, you assume this was a last-chance 24 letter? 25 A. Well, having been terminated two times, I</p>
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<p>1 termination to begin with, the charges, as were 2 the second one, were absolutely outrageous. 3 However, I had to make a decision. I was given a 4 choice of either accepting a 30-day suspension, or 5 the termination would stand and we would proceed 6 to the next level, which would be arbitration. So 7 I chose to take the 30-day -- had I been issued a 8 30-day suspension initially, I would have fought 9 it to the end. Once you lose your job, you, you 10 obviously have no more leverage, and so my choice 11 became I either take the settlement or I take the 12 termination and then go to arbitration. So I took 13 the, I took the settlement, which was basically -- 14 the, the settlement was the 30-day suspension, as 15 well as agreeing to not pursue legal activ -- 16 action against Southwest Airlines. 17 MR. MORRIS: Okay. Thank you, that's 18 all I have. 19 MR. PRYOR: Okay. I want to see if I 20 can show you the settlement agreement. It will 21 take me just a second to find it. Hang on. 22 EXAMINATION 23 BY MR. PRYOR: 24 Q. All right. Sir? 25 A. Yes.</p>	<p>1 think I, I -- I don't really think there would be 2 a third chance. 3 Q. Okay. The letter itself didn't say that, 4 though, does it? 5 A. No. 6 Q. Okay. And you're reinstated with no loss 7 of seniority, correct? 8 A. Correct. 9 Q. Your termination is reduced to a written 10 warning, not a suspension, correct? 11 A. Yes. 12 Q. And, in fact, they are going to pay you 13 for the trips that you were pulled from, correct? 14 A. Yes. 15 Q. And what you're doing is you're agreeing 16 to not sue Southwest Airlines, right, is that the 17 next one? 18 A. Well, let, let me ask -- let me, let me 19 say, follow up on your question to me, where it 20 doesn't say it. 21 Q. Sure. 22 A. Why -- based on this settlement and the 23 outrageous reason that I was terminated, I was 24 terminated from employment for using the term -- 25 and I didn't even direct it at an individual, I</p>

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<p>1 used a term which everybody in that, that room 2 meant -- knew what I meant, operation fucktard. 3 Is that -- would any reasonable person consider 4 that a grounds for termination, and I'm assuming 5 that this particular settlement was a recognition 6 of how outrageous that accusation was, so why 7 would they give me a last-chance agreement on 8 something like that when they did something that 9 is just absolutely outrageous to begin with.</p> <p>10 Q. Okay. And, sir, you're -- that's the 11 point I'm making in terms of what this agreement 12 says. This document, this April 15, 2015 13 reinstatement agreement is not a last-chance 14 agreement, as you understand what a last-chance 15 agreement is --</p> <p>16 A. Why, why --</p> <p>17 Q. -- agree?</p> <p>18 A. Again back to my question, why, why would 19 I, why would I be obligated to sign a last-chance 20 agreement for something that never should have 21 happened to begin with?</p> <p>22 Q. I -- I'm, I'm not here to answer your 23 questions, but I would appreciate you answering 24 mine.</p> <p>25 Would you agree with me that this</p>	<p>1 MR. PRYOR: Okay. After a discussion 2 off the record, counsel have agreed that it is not 3 necessary for the court reporter to mark any of 4 the exhibits discussed in the deposition to the 5 deposition with one exception, which I'll discuss 6 in a moment. I will, however, I will, however, 7 send the exhibits that were discussed to counsel 8 for defendants, as well as the court reporter. 9 The one exception is what was referred to in the 10 testimony as April 15, '20 -- boy.</p> <p>11 MR. CLOUTMAN: '15.</p> <p>12 MR. PRYOR: Is it '15? 2015. That 13 document will be attached to the deposition and 14 marked Exhibit 1 Talburt by the court reporter. 15 Counsel, have I stated our agreement accurately?</p> <p>16 MR. CLOUTMAN: Yes.</p> <p>17 MR. MORRIS: Yes.</p> <p>18 MR. PRYOR: Okay. Great. Then I 19 think we're done. Thank you, Madam Court 20 Reporter, and thank you, Videographer.</p> <p>21 MR. CLOUTMAN: Thank you, Mr. Talburt.</p> <p>22 THE REPORTER: Okay.</p> <p>23 What about reading and signing?</p> <p>24 MR. CLOUTMAN: He doesn't have counsel 25 in the case, so I don't know how we're going to do</p>
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<p>1 April 15, 2015 reinstatement agreement between you 2 and Southwest is not a, is not a last-chance 3 agreement, nor do you think it should have been?</p> <p>4 A. Correct. Yes, I agree with that.</p> <p>5 MR. PRYOR: Okay. All right. Pass 6 the witness.</p> <p>7 MR. MORRIS: I have no questions.</p> <p>8 THE VIDEOGRAPHER: Anyone else?</p> <p>9 MR. CLOUTMAN: I have no questions.</p> <p>10 Thank you.</p> <p>11 THE VIDEOGRAPHER: Going off the 12 record at 7:28.</p> <p>13 MR. PRYOR: Thank you, everyone.</p> <p>14 THE REPORTER: Before we go -- okay. 15 No one get off, no one get off. Bobby, can you 16 take that down just real quick so I can see.</p> <p>17 MR. PRYOR: Yes. Let me stop sharing.</p> <p>18 THE REPORTER: Thank you. Doe anyone 19 want to purchase a copy?</p> <p>20 MR. CLOUTMAN: Yes, the union does. 21 Condensed only.</p> <p>22 MR. MORRIS: We'll have the same. 23 (Discussion off the record).</p> <p>24 THE REPORTER: Okay. Okay. Back on 25 the record.</p>	<p>1 that.</p> <p>2 MR. PRYOR: You get to read and sign 3 your deposition. Typically a deposition is 4 admitted at trial if it's -- without signature if 5 it's shortly before trial. But you certainly can 6 waive signature. We don't have -- you don't have 7 a, you don't have a attorney here, so it's just 8 going to be up to you. You're entitled to read 9 the deposition, make sure this court reporter 10 doesn't mistranscribe anything you said. I will 11 point out we do have a video version, but if you 12 want her to send you a copy and you want to read 13 and sign it, she'll be happy to.</p> <p>14 THE WITNESS: Not necessary. 15 (Exhibit 1 marked). 16 (Deposition concluded at 7:33 p.m.) 17 (Signature waived).</p> <p>18 19 20 21 22 23 24 25</p>

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF TEXAS
3 DALLAS DIVISION
4 CHARLENE CARTER,)
5)
6 Plaintiff,)
7)
8 VS.) CIVIL ACTION
9)
10) NO.: 3:17-cv-02278-X
11 SOUTHWEST AIRLINES CO.,)
12 AND TRANSPORT WORKERS)
13 UNION OF AMERICA, LOCAL)
14 556,)
15)
16 Defendants.)
17
18 REPORTER'S CERTIFICATION
19 DEPOSITION OF BRIAN TALBURT
20 JULY 3, 2022
21
22 I, Melody A. Monk, Certified Shorthand
23 Reporter in and for the State of Texas, hereby
24 certify to the following:
25 That the witness, BRIAN TALBURT, was duly
 sworn by the officer and that the transcript of
 the oral deposition is a true record of the
 testimony given by the witness;
 That the witness waived signature;
 That the amount of time used by each party at
 the deposition is as follows:
 BOBBY G. PRYOR.....02 HOUR(S):54 MINUTE(S)

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1 EDWARD B. CLOUTMAN, III.....0 HOUR(S):01 MINUTE(S)
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3 deposition officer at the time said testimony was
4 taken, the following includes counsel for all
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7 That \$_____ is the deposition officer's
8 charges to the Plaintiff for preparing the
9 original deposition transcript and any copies of
10 exhibits;
11 I further certify that I am neither counsel
12 for, related to, nor employed by any of the
13 parties or attorneys in the action in which this
14 proceeding was taken, and further that I am not
15 financially or otherwise interested in the outcome
16 of the action.
17 Certified to by me this 4th day of July, 2022.
18
19 *Melody A. Monk*
20 Melody A. Monk, RPR
21 Texas CSR No. 3613
22 Expiration Date: 10/21/2022
23
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25 Firm Registration No. 10821
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